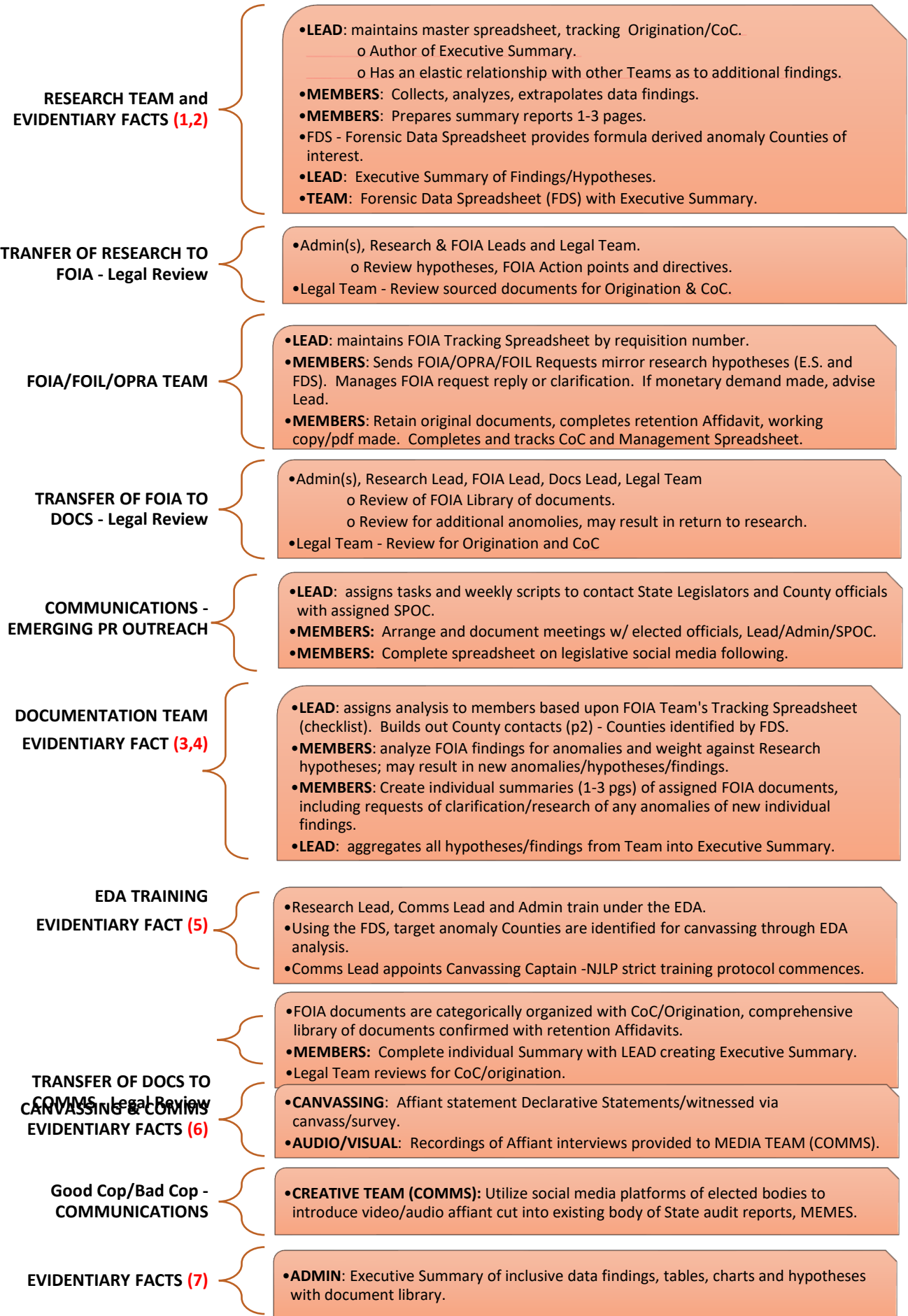


# NEW JERSEY LIBERTY PROJECT WORKFLOW



# Democracy Works Inc

Brooklyn, NY • Tax-exempt since June 2011 • EIN: 27-2460359

Subscribe

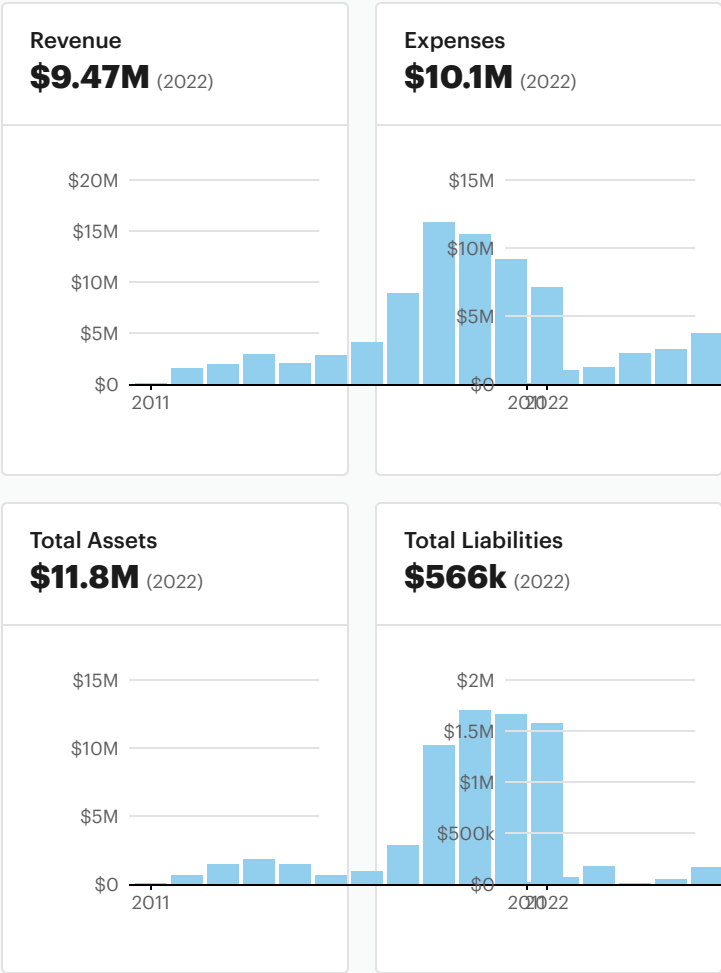
Receive an email when new data is available for this organization.

## Type of Nonprofit

Designated as a 501(c)3

Category: Civil Rights, Social Action, Advocacy / Voter Education, Registration (NTEE)

Donations to this organization are tax deductible.



Source: Form 990 tax filings from 2011 to 2022

## Tax Filings by Year

Form 990 is an information return that most organizations claiming federal tax-exempt status must file yearly with the IRS. [Show more](#)

Fiscal Year Ending Dec.

2022

Revenue	\$9,467,681	
Expenses	Net Income	Net Assets
\$10,117,455	-\$649,774	\$11,219,492

990

Filed on Oct. 23, 2023

Primary tax return for a nonprofit's activities, finances, and governance

[+ View More Financial Data](#)

[View Filing](#)

Schedules ▼

[XML](#)

### Compensation

#### Key Employees and Officers

Key Employees and Officers	Compensation	Related	Other
Luis Lozada (Ceo)	\$258,504	\$0	\$12,751

Nonprofit Explorer > New York



Nonprofits ▼

Search for a nonprofit



Sonya Glazer (Chief Financial Officer)	\$207,274	\$0	\$36,859
--	-----------	-----	----------

[+ View more people](#)

Fiscal Year Ending Dec.

2021

**Revenue** **\$12,158,361**

Expenses	Net Income	Net Assets
<b>\$11,376,666</b>	<b>\$781,695</b>	<b>\$11,869,266</b>

[+ View More Financial Data](#)

**990**

Filed on Oct. 19, 2022

Primary tax return for a nonprofit's activities, finances, and governance

[View Filing](#)

Schedules ▼

[XML](#)

### Compensation

#### Key Employees and Officers

Key Employees and Officers	Compensation	Related	Other
Seth E Flaxman (Ceo (Through Dec 2021))	\$254,116	\$0	\$163,654
Luis Lozada (General Counsel/Interim Ceo)	\$190,297	\$0	\$11,593
Maria Bianchi (Vp Of Program & Product)	\$174,161	\$0	\$13,515

[+ View more people](#)

Fiscal Year Ending Dec.

2020

**Revenue** **\$14,624,951**

Expenses	Net Income	Net Assets
----------	------------	------------

**990**

Filed on Oct. 29, 2021

Primary tax return for a nonprofit's activities, finances, and governance

**\$13,375,075****\$1,249,876**

2199

**\$11,087,571**[+ View More Financial Data](#)[View Filing](#)

Schedules ▼

XML

**Compensation****Key Employees  
and Officers****Compensation****Related****Other**Seth E  
Flaxman  
(Ceo)

\$250,619

\$0

\$11,240

Christopher  
Shea (Vp Of  
Engineering)

\$180,619

\$0

\$881

Maria Bianchi  
(Vp Of  
Program &  
Product)

\$169,702

\$0

\$12,486

[+ View more people](#)Fiscal Year Ending  
Dec.**2019****Revenue****\$15,805,279****Expenses****\$8,429,498****Net Income****\$7,375,781****Net Assets****\$9,934,635**[+ View More Financial Data](#)**Compensation****Key Employees  
and Officers****Compensation****Related****Other**Seth E  
Flaxman  
(Ceo)

\$198,621

\$0

\$9,885

Kathryn  
Peters  
(Secretary/Coo)

\$190,000

\$0

\$17,722

Christopher  
Shea (Vp Of  
Engineering)

\$154,333

\$0

\$2,000

[+ View more people](#)**990**

Filed on Nov. 13, 2020

Primary tax return for a nonprofit's  
activities, finances, and governance[View Filing](#)

Schedules ▼

PDF

XML

**990-T**For unrelated business income from  
activities not substantially related to the  
organization's tax-exempt purpose[PDF](#)Fiscal Year Ending  
Dec.**2018****Revenue****\$8,832,890****Expenses****\$7,006,810****Net Income****\$1,826,080****Net Assets****\$2,566,854****990**

Filed on Nov. 15, 2019

Primary tax return for a nonprofit's  
activities, finances, and governance



[+ View More Financial Data](#)

### Compensation

#### Key Employees and Officers

	Compensation	Related	Other
Christopher Shea (Senior Software Engineer)	\$148,442	\$0	\$1,892
Seth E Flaxman (Executive Director)	\$147,596	\$0	\$13,742
Kathryn Peters (Secretary/Coo)	\$141,048	\$0	\$18,540

[+ View more people](#)
[View Filing](#)

Schedules ▼

[PDF](#)
[XML](#)

### 990-T

For unrelated business income from activities not substantially related to the organization's tax-exempt purpose

[PDF](#)

Fiscal Year Ending  
Dec.

## 2017

**Revenue** **\$4,091,954**

Expenses

**\$3,798,288**

Net Income

**\$293,666**

Net Assets

**\$740,774**
[+ View More Financial Data](#)

### Compensation

#### Key Employees and Officers

	Compensation	Related	Other
Christopher Shea (Senior Software Engineer)	\$135,044	\$0	\$968
David Della Costa (Software Engineer)	\$132,462	\$0	\$21,109
Wesley Morgan (Cto)	\$127,866	\$0	\$27,666

[+ View more people](#)

### 990

Filed on Nov. 12, 2018

Primary tax return for a nonprofit's activities, finances, and governance

[View Filing](#)

Schedules ▼

[PDF](#)
[XML](#)

Fiscal Year Ending  
Dec.

## 2016

**Revenue** **\$2,781,846**

Expenses

**\$3,678,170**

Net Income

**-\$896,324**

Net Assets

**\$447,108**

### 990

Filed on Nov. 14, 2017

Primary tax return for a nonprofit's activities, finances, and governance

[+ View More Financial Data](#)[View Filing](#)

Schedules ▼

PDF

XML

**Compensation****Key Employees  
and Officers****Compensation****Related****Other**Christopher  
Shea (Senior  
Software  
Engineer)

\$134,000

\$0

\$0

Wes Morgan  
(Cto)

\$129,082

\$0

\$21,811

Troy Hill  
(Senior  
Software  
Engineer)

\$123,082

\$0

\$7,653

[+ View more people](#)Fiscal Year Ending  
Dec.**2015****Revenue****\$2,057,053****Expenses****\$2,518,206****Net Income****-\$461,153****Net Assets****\$1,363,432**[+ View More Financial Data](#)**990**

Filed on Nov. 14, 2016

Primary tax return for a nonprofit's  
activities, finances, and governance[View Filing](#)

Schedules ▼

PDF

XML

**Compensation****Key Employees  
and Officers****Compensation****Related****Other**Christopher  
Shea (Senior  
Software  
Engineer)

\$134,000

\$0

\$0

Wes Morgan  
(Cto)

\$125,011

\$0

\$24,433

Troy Hill  
(Senior  
Software  
Engineer)

\$121,654

\$0

\$8,569

[+ View more people](#)Fiscal Year Ending  
Dec.**2014****Revenue****\$2,877,027****Expenses****\$2,273,576****Net Income****\$603,451****Net Assets****\$1,824,585****990**

Filed on Nov. 16, 2015

Primary tax return for a nonprofit's  
activities, finances, and governance[View Filing](#)

[+ View More Financial Data](#)

Schedules ▼

PDF

XML

### Compensation

Key Employees and Officers	Compensation	Related	Other
Christopher Shea (Senior Software Engineer)	\$134,000	\$0	\$9,619
Wes Morgan (Cto)	\$126,500	\$0	\$9,033
Troy Hill (Senior Software Engineer)	\$120,500	\$0	\$8,982

[+ View more people](#)

Fiscal Year Ending Dec.

2013

**Revenue** **\$1,928,545**

<b>Expenses</b>	<b>Net Income</b>	<b>Net Assets</b>
<b>\$1,233,823</b>	<b>\$694,722</b>	<b>\$1,233,634</b>

[+ View More Financial Data](#)

### 990

Filed on Nov. 12, 2014  
Primary tax return for a nonprofit's activities, finances, and governance

[View Filing](#)

Schedules ▼

PDF

XML

### Compensation

Key Employees and Officers	Compensation	Related	Other
Seth E Flaxman (President)	\$72,500	\$0	\$5,704
Kathryn Peters (Treasurer)	\$71,733	\$0	\$8,432
Jim Bildner (Director)	\$0	\$0	\$0

[+ View more people](#)

Fiscal Year Ending  
Dec.

2012

Revenue \$1,520,375

Expenses	Net Income	Net Assets
\$982,875	\$537,500	\$538,912

[+ View More Financial Data](#)

990

Primary tax return for a nonprofit's activities, finances, and governance

PDF

Fiscal Year Ending  
Dec.

2011

Revenue \$27,051

Expenses	Net Income	Net Assets
\$29,955	-\$2,904	\$1,412

[+ View More Financial Data](#)

990-EZ

Short form tax return for a nonprofit's activities, finances, and governance

PDF

Fiscal Year Ending  
Dec.

2010

Extracted financial data is not available for the forms filed in this tax period, but Form 990 documents are available for download.

990-EZ

Short form tax return for a nonprofit's activities, finances, and governance

PDF

About This Data

Nonprofit Explorer includes summary data for nonprofit tax returns and full Form 990 documents, in both PDF and digital formats.

The summary data contains information processed by the IRS during the 2012-2019 calendar years; this generally consists of filings for the 2011-2018 fiscal years, but may include older records. This data release includes only a subset of what can be found in the full Form 990s.

In addition to the raw summary data, we link to PDFs and digital copies of full Form 990 documents wherever possible. This consists of separate releases by the IRS of Form 990 documents processed by the agency, which we update regularly.

We also link to copies of audits nonprofit organizations that spent \$750,000 or more in Federal grant money in a single fiscal year since 2016. These audits are copied from the Federal Audit Clearinghouse.

Which Organizations Are Here?



Official Election Results Report  
 Date 11/15/2021 Time 10:03  
 Polling Place ID 64068  
 Polling Place Name Manchester District 05  
 Polling Place ID 64068  
 Polling Version 1  
 Report Source Cartridge Memory

2021  
 Official Annual General  
 Election

Report Source Cartridge Memory

2021  
 Official Annual General  
 Election

Candidate Candidate Totals Total

\* Governor (1)

D9 Jack CIATTARELLI 31  
 D9 Philip MURPHY 11  
 D9 Gregg MCLE 0  
 D9 Joanne KUNIAWSKY 0  
 D9 Madeline R. HOFFMAN 0  
 D9 WRITE-IN 0

\* State Senator 10th Leg (1)

D10 Jim HOLZAPFEL 29  
 D10 Emma MAMMADO 11  
 D10 WRITE-IN 0

\* General Assembly (2)

D11 Gregory P. McCUCKIN 29  
 D12 John CATALANO 27  
 D11 Garret 'Tony' KONO 11  
 D12 Mary 'Sharon' GULLIVER 0  
 D11 WRITE-IN 0  
 D12 WRITE-IN 0

\* Freeholder (2)

D13 Gary QUINN 28  
 D14 Barbara 'Bobbi' Jo CHEA 25  
 D14 Philip HUBBIO 10  
 D14 Catherine PARRA 1  
 D14 Dan VALENTINI 1  
 D14 Robert CAMPFIELD 0  
 D14 Barry BISHOP 0  
 D14 WRITE-IN 0  
 D14 WRITE-IN 0

\* Manchester Mayor (1)

D17 Robert HUDAK 11  
 D17 Robert ARACE 27  
 D17 WRITE-IN 0

\* Member of Council Unexp. (1)

D18 Michele ZOLEZI 12  
 D18 Joseph T. HARRIS 24  
 D18 WRITE-IN 0

\* Member of the Bd. of Ed. (2)

D19 George J. CERVENAK III 8  
 D19 Sasiya O. OMILANOWICZ 15  
 D19 Mike KELLIHER 14  
 D19 Nicole SAHLIN 9  
 D19 WRITE-IN 0  
 D19 WRITE-IN 0  
 D19 WRITE-IN 0

\* State Question No. 1 (1)

D27 Yes 7  
 D27 No 25

\* State Question No. 2 (1)

D27 Yes 11  
 D27 No 21

Write In Votes  
 No Write In Votes In Memory

Election Officers

Please Complete After Closing The Polls  
 We the undersigned Election Officers do  
 hereby certify that on the 15th day of  
 Nov. 2021 this board  
 under the scrutiny of each member,  
 closed the polls from further voting,  
 obtained this printed record of votes  
 cast on this machine and the Public  
 Counter read 3865 and the Protective  
 Counter read 43 and the machine has been sealed  
 with seal # \_\_\_\_\_

Signed:

*Alina Omilanova*  
*Sina S. Perno*  
*Robert Arace*

Printed 12/01/2021 11:03 AM

Official Election Results Report  
 Date 11/15/2021 Time 10:03  
 Polling Place ID 64068  
 Polling Place Name Manchester District 05  
 Polling Place ID 64068  
 Polling Version 1  
 Report Source Cartridge Memory

2021  
 Official Annual General  
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 cast on this machine and that after the  
 polls closed, the Protective Counter  
 read 3865 and the Public Counter read  
 43 and the machine has been sealed  
 with seal # \_\_\_\_\_

Signed:

*Alina Omilanova*  
*Sina S. Perno*  
*Robert Arace*

Printed 12/01/2021 11:03 AM

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 Polling Place Name Manchester District 05  
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 Polling Version 1  
 Report Source Cartridge Memory

2021  
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Election Officers

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 obtained this printed record of votes  
 cast on this machine and the Public  
 Counter read 3865 and the Protective  
 Counter read 43 and the machine has been sealed  
 with seal # \_\_\_\_\_

Signed:

*Alina Omilanova*  
*Sina S. Perno*  
*Robert Arace*

Printed 12/01/2021 11:03 AM

No Certification



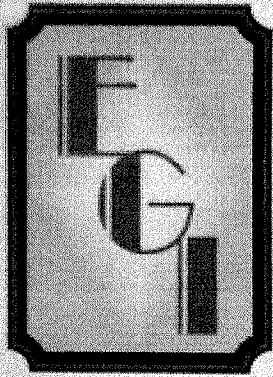
nic Ar...

7 / 28

—

100%

+



*Election Graphics, Inc.*



**Election Graphics, Inc.**

15 Rockland Terrace, Verona, NJ 07044

[electiongraphics@mindspring.com](mailto:electiongraphics@mindspring.com)

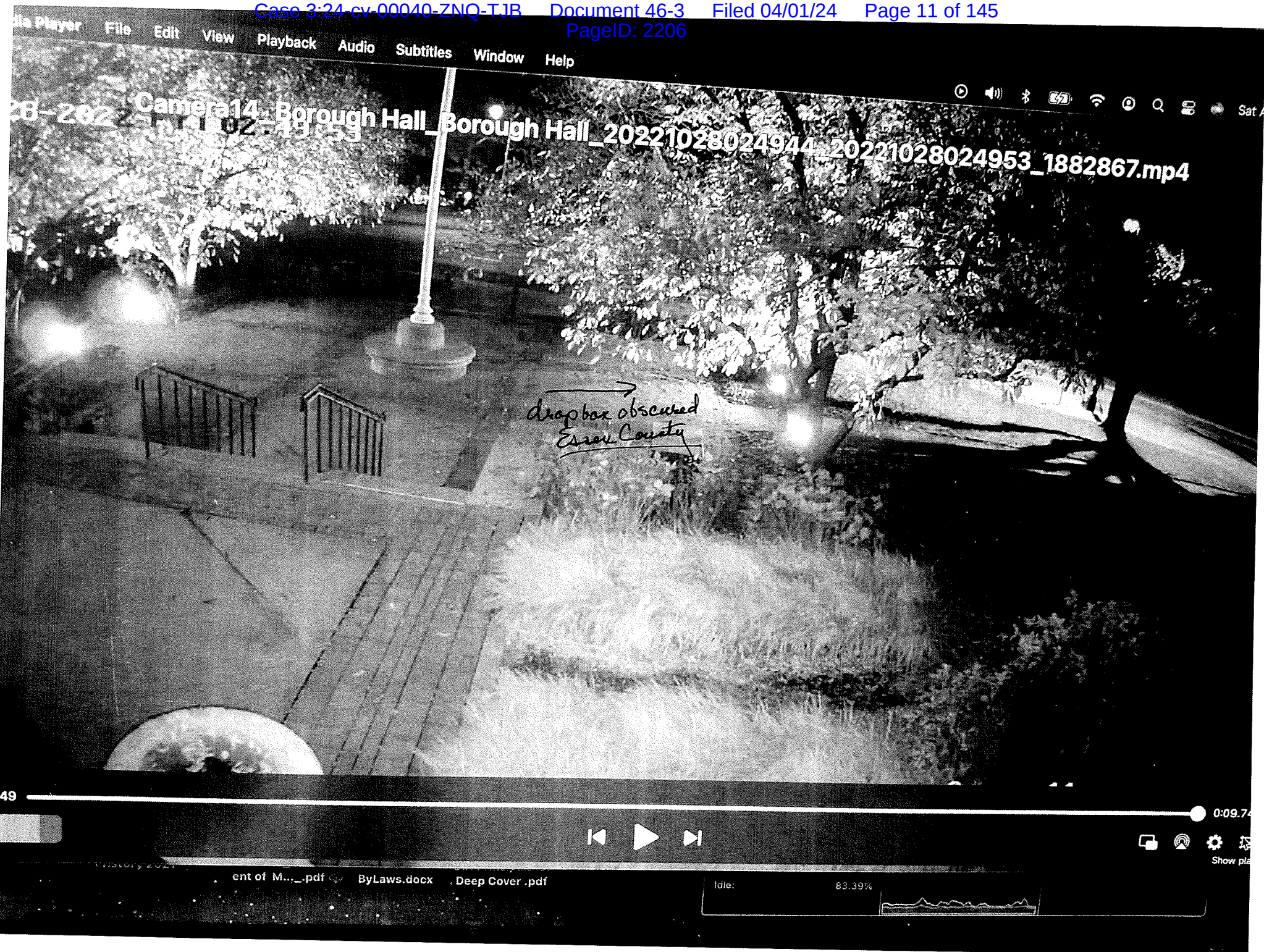
**Adam Perna**

(201) 758-9966

Election Graphics, Inc. has been providing printing services since 1904 to the counties in the State of New Jersey. Over the 115 years of our existence, these services include but are not limited to the design, layout, printing and testing of machine ballot faces, mail-in-ballots, sample ballots, provisional ballots, emergency ballots and all types of ballot envelopes.

Election Graphics, Inc. services extend to programming of all types of elections, repair and certification of voting machines







10/27/2022

Non conforming  
site location  
of drop box.

SWARTH





*Drop box opening/deposit obscured altogether.*





09:26:31



**OCEAN COUNTY**  
SUPERIOR PRODUCTS  
A Division of  
The Superior Products Company  
P.O. Box 1000  
Freehold, NJ 07728  
Tel. (609) 426-1000  
Fax (609) 426-1001

29.Oct 2022 09:26

## Timeline

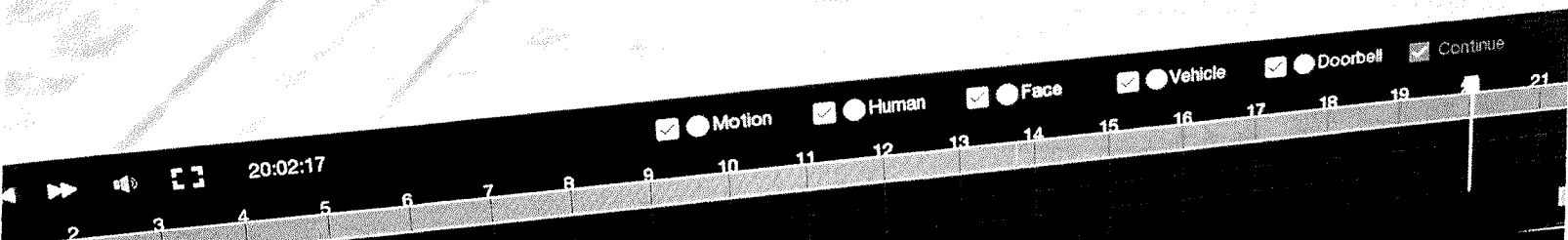
10/29/2022 9:26:31 AM

[illegible]



022 08:02:18PM

*Obscured dropbox  
location.*



DELL







March 28, 2022

[REDACTED]  
[REDACTED]  
Piscataway NJ 08854

Dear [REDACTED] SIRAGUSA

The Commissioner of Registration of Middlesex County is contacting you because within the *Statewide Voter Registration System*, your **date of birth is 01/01/1800.**

That 1/01/1800 date was a placeholder for voters during the statewide conversion from paper to electronic records during the late 1990s, where a date of birth was unavailable for a voter. Most likely, your *date of birth was not required when registering to vote or a record was not legible or available to reference when the conversion took place.*

The reason why the Middlesex County Board of Elections is contacting you today is *that with the mandate of electronic poll books to be used for Early Voting and Election Days, an accurate date of birth is an important tool for poll workers to correctly identify voters and between voters with similar names.*

Therefore, please return this letter with your correct and legible date of birth:

Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

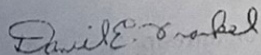
*Please make sure you return this letter it in the enclosed postage paid envelope so that we can update our records.*

You may also send an email to [elections@co.middlesex.nj.us](mailto:elections@co.middlesex.nj.us) with the subject heading of **Correct Date of Birth**; please use your Voter Identification Number located above within the email so staff can properly update your records.

If you have any questions about this form, please contact us at 732-745-3471.

Thank you for your cooperation.

Sincerely,



Daniel Frankel  
Commissioner of Registration

**Mary Basile Logan**

---

**From:** Elections, Opra [DOS] <Opra.Elections@sos.nj.gov>  
**Sent:** Friday, September 1, 2023 10:51 AM  
**To:** Mary Basile Logan  
**Subject:** RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of September 21, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Monday, August 14, 2023 3:42 PM  
To: 'trino@trinops.com' <trino@trinops.com>  
Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of September 1, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Tuesday, July 25, 2023 12:01 PM  
To: 'trino@trinops.com' <trino@trinops.com>  
Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of August 14, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Wednesday, July 5, 2023 3:08 PM  
To: 'trino@trinops.com' <trino@trinops.com>  
Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of July 25, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Thursday, June 15, 2023 9:13 AM  
To: 'trino@trinops.com' <trino@trinops.com>  
Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of July 5, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Wednesday, May 24, 2023 2:52 PM  
To: trino@trinops.com  
Subject: FW: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of June 14, 2023.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Monday, May 8, 2023 10:09 AM  
To: trino@trinops.com  
Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of May 24, 2023.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Friday, April 14, 2023 2:04 PM  
To: trino@trinops.com  
Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of May 4, 2023.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Friday, March 24, 2023 2:35 PM  
To: 'trino@trinops.com' <trino@trinops.com>  
Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of April 14, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Monday, March 6, 2023 3:14 PM  
To: trino@trinops.com  
Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of March 24, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Monday, February 13, 2023 10:26 AM  
To: trino@trinops.com  
Subject: FW: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of March 6, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]  
Sent: Tuesday, January 24, 2023 10:07 AM  
To: trino@trinops.com



Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of February 13, 2023.

Thank you.

-----Original Message-----

From: Elections, Opra [DOS]

Sent: Thursday, December 29, 2022 9:53 AM

To: trino@trinops.com

Subject: RE: Government Records Request State/Division of Elections W195032

The Division of Elections of the New Jersey Department of State received your Open Public Records Act (OPRA) request, # W195032, on December 21, 2022.

Your request requires additional time to fulfill. Please allow up to two weeks for response to your request. This shall set a due date of January 20, 2023.

Thank you.

-----Original Message-----

From: OPRAreturn@oit.state.nj.us <OPRAreturn@oit.state.nj.us>

Sent: Wednesday, December 21, 2022 10:35 AM

To: Elections, Opra [DOS] <Opra.Elections@sos.nj.gov>

Subject: Government Records Request State/Division of Elections W195032

\*\*\*\*\*

Below is the information submitted by the OPRA requestor for Govt. Records Request # W195032.

Please use the OPRA Tracking System to process Govt. Records Request # W195032.

\*\*\*\*\*

State Agency: State/Division of Elections

Requestor Name: Mary Basile Logan

Company:

Address: 65 Old Highway 22, Suite 5

Clinton NJ 08809

Email: trino@trinops.com

Telephone: 908 200 7294

Convicted of indictable offense: NO

Preferred Delivery: E-Mail

Maximum Authorized Cost: \$1.00

Payment Method: None Selected

Requested Information: This OPRA request regards the time period of early voting, October 29, 2022 and extends through the General Election certification, on or about December 8, 2022. As enumerated:

1. Incident report(s) generated subject of early voting location or a polling place wherein a county board of elections or superintendent of elections noticed your office during the period of October 29, 2022 through final counting or election certification as any/all disruptions may have imposed. Responsive record request fulfillment to include any open matter, unresolved at the time of this request.

Request should include:

- Copies of protocols; lateral and horizontal, in project management of incident handling/reporting/resolution.
  - Polling place location identification.
  - Reason for dispatch.
  - Name of the police or law enforcement officer dispatched including badge number.
  - Resolution report of each such incident.
2. Copy of communications by and between County and/or individual Precincts within the State of New Jersey, citing emergent circumstances arising from:
- Scanning/Tabulation of citizen informed ballots.
  - Reports of resolution in adjudication of informed ballots, whether emergent or upon election certification, including curing and those requiring election Court hearing(s).
  - Emergent protocol changes and communication to same which resulted from emergent circumstances, by and between the office of the Secretary of State; the Attorney General - inclusive of the Office of Public Integrity and Accountability as well the New Jersey Cybersecurity and Communications Integration Cell; the Department of Justice - inclusive of CRT Division and that of the County and/or individual Precinct(s).
  - Comprehensive list of emergent persons and reports generated of individuals temporarily deputized by election officials for ballot retrieval, transport and/or scanning tabulation from among the 21 Counties and inclusive of individual Precincts within the State of New Jersey.
    - o Associated communication in support of such temporary designations
  - Reports generated, verifying full chain of custody in the emergent circumstance of Mercer County, transfer of citizen informed ballots to scanner/tabulation.
    - o Associated communication in support of temporary deputized persons from among the bi-partisan Commission who performed such tabulation.
    - o Associated chain of custody in the case of ballot transport, inclusive of ballot box seal codes and signatures on both ends of transport.

\*This request was originally received by the Division of Elections via certified mail on December 19, 2022.

Mary Basile Logan  
65 Old Highway 22, Suite 5  
Clinton, New Jersey 08809  
(908) 200-7294  
Trino@trinops.com



April 28, 2023

Sent VIA USPS Mail Certified Tracking

Ms. Dianna Houenou, Chair  
New Jersey Cannabis Regulatory Commission  
Post Office Box 360  
Trenton, New Jersey 08625-0360

RE: Performance Audits – Inclusive Grants (2021, 2022 and 2023 – to date)

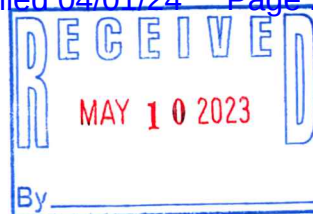
Dear Ms. Houenou:

Pursuant to the New Jersey Open Public Records Act (OPRA) New Jersey S.A. 47:1A-13, and as further informed by *Burnett v. Cty. Of Bergen*, 198 N.J. 408, 414 (2009); I hereby request the following records be produced, in the original or common pdf format, as described below:

**Full Description:** For years 2021, 2022 and 2023 (to date) the comprehensive audits of the “Management and Administration of Incentive Programs”, inclusive of all appendices associated. The foregoing should rightly include a comprehensive directory of those NGO and non-profit organizations receiving taxpayer or grant funds in the interest of public trust with same being provided by the Cannabis Regulatory Commission.

To facilitate fulfillment of this request, please feel confident to use my email, above referenced. If records are too voluminous to transmit via email, kindly advise and I will provide a sealed external storage drive so as not to encumber or burden your offices. If my request does not adequately describe the records to be produced, please contact me so that I may clarify my request, advising me of the manner in which records are filed, retrieved or generated and the status thereto.

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April 28, 2023



If for any reason any portion of my request is denied, please forward the non-denied records, and inform me of each specific reason for the denial of each item in writing. Also, kindly provide the name, street address and email address of the person or body to whom an appeal should be directed.

If no records exist responsive to the above request(s), I hereby request a certification to that effect. For records produced in response to the above request(s), I hereby request a certification that the record(s) produced are, in fact, certifiable.

Pursuant to Public Officers Law § 89 (3), within five business days of the receipt of this request, you must grant the requestor either written denial, as well a detailed response for the reason of any denial in whole or part, or provide a date of certainty when such a response will be provided. If for any reason any portion of my request is denied, please inform me of the reasons for the denial in writing and provide the name, address and e-mail address of the person or body to whom an appeal should be directed.

Please feel free to email me with any questions or suggestions that you may have. Thanking you, in advance.

Sincerely,

Mary B. Logan, MPP



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

05/18/2023

Ms. Mary Logan

email: trino@trinops.com

RE: Your FOIA Request to Treasury, Case Number 2023-FOIA-00475

Dear Ms. Logan:

This letter acknowledges the receipt of your Freedom of Information Act (FOIA) request to the U.S. Department of the Treasury, dated 05/16/2023. Your request is outlined as follows:

"In accordance with 5 U.S. Code § 552 – Public information; agency rules, opinions, orders, records, and proceedings, I hereby request a copy of the plan introduced under TARP, presented by American International Group (AIG) Trustees under the restructuring plan, herein described as “Project Destiny”.

In accordance with FOIA rules held to the Treasury, the subject plan being a component of Congressional testimony, and made manifest into the repayment of taxpayer funds with the plan established for the exacting purpose and “...goal for the benefit of American taxpayers” (transcript May 13, 2005 House Oversight Committee Hearing – 12:47) this request is deemed reasonable.”

I have initiated a search within the Departmental Offices for records that would be responsive to your request. Every effort will be made to provide you with a timely response; however, unusual circumstances exist regarding the search for and review of potentially responsive records which may delay our response. This may include the need to consult with multiple program offices, to review a voluminous quantity of records, or to search for records stored in multiple locations. I invite you to contact my office to discuss limiting the scope of your request which could significantly reduce the time needed to process your request.

If you have any questions or wish to discuss reformulation or an alternative time frame for the processing of your request, you may contact Treasury’s FOIA Public Liaison by phone at (202) 622-8098 or by email at [FOIAPL@treasury.gov](mailto:FOIAPL@treasury.gov).

If the FOIA Public Liaison is unable to satisfactorily resolve your question or concern, the Office of Government Information Services (OGIS) also mediates disputes between FOIA requesters and federal agencies as a non-exclusive alternative to litigation. If you wish to contact OGIS, you may contact the agency directly by email at [OGIS@nara.gov](mailto:OGIS@nara.gov), by phone at (877) 684-6448, by fax at (202) 741-5769 or by mail at the address below:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road – OGIS  
College Park, MD 20740-6001

You may reach me via telephone at 202-622-0930, extension 2; or via e-mail at [FOIA@treasury.gov](mailto:FOIA@treasury.gov). Please reference FOIA case number 2023-FOIA-00475 when contacting our office about this request.

Sincerely,

Cawana Pearson  
FOIA and Transparency  
Office of Privacy, Transparency, and Records  
U.S. Department of the Treasury



Mary Basile Logan  
65 Old Highway 22, Suite 5  
Clinton, New Jersey 08809  
(908) 200-7294  
Trino@trinops.com

April 28, 2023

Sent VIA USPS Mail Certified Tracking

Mr. Kevin Walsh  
Office of the State Comptroller  
Post Office Box 024  
Trenton, New Jersey 08625

RE: New Jersey Economic Development Authority  
Performance Audits – Inclusive Grants (2020, 2021, 2022 and 2023 – to date)

Dear Mr. Walsh:

Pursuant to the New Jersey Open Public Records Act (OPRA) New Jersey S.A. 47:1A-13, and as further informed by *Burnett v. Cty. Of Bergen*, 198 N.J. 408, 414 (2009); I hereby request the following records be produced, in the original or common pdf format, as described below:

**Full Description:** For years 2020, 2021, 2022 and 2023 (to date) the comprehensive Statewide audits of the “Management and Administration of Incentive Programs”, inclusive of all appendices associated. The foregoing should rightly include a comprehensive directory of those NGO and non-profit organizations receiving taxpayer or grant funds in the interest of public trust with same being provided by the New Jersey Economic Development Authority, State of New Jersey, either directly or as a conduit for the State.

To facilitate fulfillment of this request, please feel confident to use my email, above referenced. If records are too voluminous to transmit via email, kindly advise and I will provide a sealed external storage drive so as not to encumber or burden your offices. If my request does not adequately describe the records to be produced, please contact me so that I may clarify my request, advising me of the manner in which records are filed, retrieved or generated and the status thereto.

If for any reason any portion of my request is denied, please forward the non-denied records, and inform me of each specific reason for the denial of each item in writing. Also, kindly provide the name, street address and email address of the person or body to whom an appeal should be directed.

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April 28, 2023

If no records exist responsive to the above request(s), I hereby request a certification to that effect. For records produced in response to the above request(s), I hereby request a certification that the record(s) produced are, in fact, certifiable.

Pursuant to Public Officers Law § 89 (3), within five business days of the receipt of this request, you must grant the requestor either written denial, as well a detailed response for the reason of any denial in whole or part, or provide a date of certainty when such a response will be provided. If for any reason any portion of my request is denied, please inform me of the reasons for the denial in writing and provide the name, address and e-mail address of the person or body to whom an appeal should be directed.

Please feel free to email me with any questions or suggestions that you may have. Thanking you, in advance.

Sincerely,



Mary B. Logan, MPP



Mary Basile Logan  
65 Old Highway 22, Suite 5  
Clinton, New Jersey 08809  
(908) 200-7294  
Trino@trinops.com

April 28, 2023

Sent VIA USPS Mail Certified Tracking

Ms. Sheila Oliver, Commissioner  
Department of Community Affairs  
Post Office Box 800  
Trenton, New Jersey 08625-0800

RE: Performance Audits – Inclusive Grants (2020, 2021, 2022 and 2023 – to date)

Dear Ms. Oliver:

Pursuant to the New Jersey Open Public Records Act (OPRA) New Jersey S.A. 47:1A-13, and as further informed by *Burnett v. Cty. Of Bergen*, 198 N.J. 408, 414 (2009); I hereby request the following records be produced, in the original or common pdf format, as described below:

**Full Description:** For years 2020, 2021, 2022 and 2023 (to date) the comprehensive Statewide audits of the “Management and Administration of Incentive Programs”, inclusive of all appendices associated. The foregoing should rightly include a comprehensive directory of those NGO and non-profit organizations receiving taxpayer or grant funds in the interest of public trust with same being provided by the Department of Community Affairs, State of New Jersey, including but not limited to:

- Government Records Council
- New Jersey Historic Trust
- New Jersey Housing and Mortgage Finance Agency
- LUARCC
- New Jersey Redevelopment Authority
- Urban Enterprise Zone (EUZ) Program

To facilitate fulfillment of this request, please feel confident to use my email, above referenced. If records are too voluminous to transmit via email, kindly advise and I will provide a sealed external storage drive so as not to encumber or burden your offices. If my request does not adequately describe the records to be produced, please contact me so that I may clarify my request, advising me of the manner in which records are filed, retrieved or generated and the status thereto.

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April 28, 2023

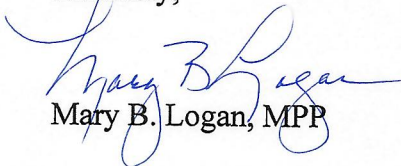
If for any reason any portion of my request is denied, please forward the non-denied records, and inform me of each specific reason for the denial of each item in writing. Also, kindly provide the name, street address and email address of the person or body to whom an appeal should be directed.

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Please feel free to email me with any questions or suggestions that you may have. Thanking you, in advance.

Sincerely,



Mary B. Logan, MPP

Mary Basile Logan  
65 Old Highway 22, Suite 5  
Clinton, New Jersey 08809  
(908) 200-7294  
Trino@trinops.com

April 28, 2023

Sent VIA USPS Mail Certified Tracking

Joseph L. Fiordaliso, President  
State of New Jersey  
Board of Public Utilities  
44 South Clinton Avenue, 1<sup>st</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625

RE: Performance Audits – Inclusive Grants (2020, 2021, 2022 and 2023 – to date)

Dear Mr. Fiordaliso:

Pursuant to the New Jersey Open Public Records Act (OPRA) New Jersey S.A. 47:1A-13, and as further informed by *Burnett v. Cty. Of Bergen*, 198 N.J. 408, 414 (2009); I hereby request the following records be produced, in the original or common pdf format, as described below:

**Full Description:** For years 2020, 2021, 2022 and 2023 (to date) the comprehensive Statewide audits of the “Management and Administration of Incentive Programs”, inclusive of all appendices associated. The foregoing should rightly include a comprehensive directory of those NGO and non-profit organizations receiving taxpayer or grant funds in the interest of public trust with same being provided by the Board of Public Utilities, State of New Jersey, either directly or as a conduit for the State.

To facilitate fulfillment of this request, please feel confident to use my email, above referenced. If records are too voluminous to transmit via email, kindly advise and I will provide a sealed external storage drive so as not to encumber or burden your offices. If my request does not adequately describe the records to be produced, please contact me so that I may clarify my request, advising me of the manner in which records are filed, retrieved or generated and the status thereto.

If for any reason any portion of my request is denied, please forward the non-denied records, and inform me of each specific reason for the denial of each item in writing. Also, kindly provide the name, street address and email address of the person or body to whom an appeal should be directed.



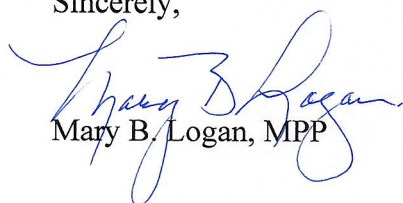
Page Two  
April 28, 2023

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Pursuant to Public Officers Law § 89 (3), within five business days of the receipt of this request, you must grant the requestor either written denial, as well a detailed response for the reason of any denial in whole or part, or provide a date of certainty when such a response will be provided. If for any reason any portion of my request is denied, please inform me of the reasons for the denial in writing and provide the name, address and e-mail address of the person or body to whom an appeal should be directed.

Please feel free to email me with any questions or suggestions that you may have. Thanking you, in advance.

Sincerely,



Mary B. Logan, MPP

# Election Summary Report

General Election

Mercer County, NJ

November 08, 2022

Summary for: All Contests, All Districts, All Tabulators, All Counting Groups

Unofficial and Incomplete

Zero After Pre-LAT

Voters Cast: 0 of 0 (N/A)

## U.S. House of Representatives - 3rd Congressional District (Vote for 1)

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Andy KIM	Dem	0	0	0	0	0	0	0
Bob HEALEY	Rep	0	0	0	0	0	0	0
Christopher RUSSOMANNO	LBR	0	0	0	0	0	0	0
Gregory M. SOBOCINSKI	GSA	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

## U.S. House of Representatives - 12th Congressional District (Vote for 1)

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Bonnie WATSON COLEMAN	Dem	0	0	0	0	0	0	0
Darius MAYFIELD	Rep	0	0	0	0	0	0	0
C. Lynn GENRICH	LBR	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

		Total	
Times Cast		0 / 0	N/A

Candidate	Total	
Andy KIM	0	
Bob HEALEY	0	
Christopher RUSSOMANNO	0	
Gregory M. SOBOCINSKI	0	
Total Votes	0	

		Total	
Unresolved Write-In		0	

		Total	
Times Cast		0 / 0	N/A

Candidate	Total	
Bonnie WATSON COLEMAN	0	
Darius MAYFIELD	0	
C. Lynn GENRICH	0	
Total Votes	0	

		Total	
Unresolved Write-In		0	

**Board of County Commissioners (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Nina D. MELKER	Dem	0	0	0	0	0	0	0
Cathleen LEWIS	Dem	0	0	0	0	0	0	0
Michael CHIANESE	Rep	0	0	0	0	0	0	0
Andrew KOTULA, Jr.	Rep	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Mayor - Ewing Township (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Bert H. STEINMANN	Dem	0	0	0	0	0	0	0
Ronald PRYKANOWSKI	Rep	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Mayor - Hightstown Borough (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Susan BLUTH	Dem	0	0	0	0	0	0	0
Michael R. BOLLENTIN	POP	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0



Total		
Times Cast	0 / 0	N/A

Candidate	Total
Nina D. MELKER	0
Cathleen LEWIS	0
Michael CHIANESE	0
Andrew KOTULA, Jr.	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Bert H. STEINMANN	0
Ronald PRYKANOWSKI	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Susan BLUTH	0
Michael R. BOLLENTIN	0
Total Votes	0

Total		
Unresolved Write-In	0	



**Mayor - Trenton (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Cherie GARRETTE		0	0	0	0	0	0	0
W. Reed GUSCIORA		0	0	0	0	0	0	0
Robin M. VAUGHN	FFTF	0	0	0	0	0	0	0
Kathy McBRIDE	YVOV	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Council - Ewing Township (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Kathleen Culliton WOLLERT	Dem	0	0	0	0	0	0	0
Sarah STEWARD	Dem	0	0	0	0	0	0	0
Colleen DiPASTINA	Rep	0	0	0	0	0	0	0
William ANDRES	Rep	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Council - Princeton (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Mia SACKS	Dem	0	0	0	0	0	0	0
Michelle Pirone LAMBROS	Dem	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Cherie GARRETTE	0
W. Reed GUSCIORA	0
Robin M. VAUGHN	0
Kathy McBRIDE	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Kathleen Culliton WOLLERT	0
Sarah STEWARD	0
Colleen DiPASTINA	0
William ANDRES	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Mia SACKS	0
Michelle Pirone LAMBROS	0
Total Votes	0

Total		
Unresolved Write-In	0	

**Council - At-Large - Trenton (Vote for 3)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Yazminelly GONZALEZ	ITAVFA	0	0	0	0	0	0	0
Jasi EDWARDS	CCTTC	0	0	0	0	0	0	0
Kadja MANUEL	FTPPLG	0	0	0	0	0	0	0
Alexander BETHEA	TEC	0	0	0	0	0	0	0
Clifton ANDERSON		0	0	0	0	0	0	0
Waldemar I. RONQUILLO		0	0	0	0	0	0	0
Taiwanda TERRY-WILSON	FOABTP	0	0	0	0	0	0	0
Crystal FELICIANO	EABTT	0	0	0	0	0	0	0
Michael RANALLO		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**North Ward Council - Trenton (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Jennifer WILLIAMS		0	0	0	0	0	0	0
Merkle CHERRY		0	0	0	0	0	0	0
Algernon WARD, Jr.	NTTWT	0	0	0	0	0	0	0
Divine ALLAH	IOT	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**South Ward Council - Trenton (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Damian G. MALAVE	TWCMD	0	0	0	0	0	0	0
Evangeline A. UGORJI	BAUSW	0	0	0	0	0	0	0
Jenna Figueroa KETTENBURG	TMWLM	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0



Total		
Times Cast	0 / 0	N/A

Candidate	Total
Yazminelly GONZALEZ	0
Jasi EDWARDS	0
Kadja MANUEL	0
Alexander BETHEA	0
Clifton ANDERSON	0
Waldemar I. RONQUILLO	0
Taiwanda TERRY-WILSON	0
Crystal FELICIANO	0
Michael RANALLO	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Jennifer WILLIAMS	0
Merkle CHERRY	0
Algernon WARD, Jr.	0
Divine ALLAH	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Damian G. MALAVE	0
Evangeline A. UGORJI	0
Jenna Figueroa KETTENBURG	0
Total Votes	0

Total		
Unresolved Write-In	0	

**East Ward Council - Trenton (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Joseph A. HARRISON	ALWCT	0	0	0	0	0	0	0
Sonya A. WILKINS	LFASEW	0	0	0	0	0	0	0
Ophelia M. ADDERLEY	LMTF	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**West Ward Council - Trenton (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Teska FRISBY	SGIT	0	0	0	0	0	0	0
Atalaya ARMSTRONG	ALTPC	0	0	0	0	0	0	0
Mary HORNE	ETWW	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Common Council - Hightstown Borough (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Joshua JACKSON	Dem	0	0	0	0	0	0	0
Todd FRANTZ	Dem	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Joseph A. HARRISON	0
Sonya A. WILKINS	0
Ophelia M. ADDERLEY	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Teska FRISBY	0
Atalaya ARMSTRONG	0
Mary HORNE	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Joshua JACKSON	0
Todd FRANTZ	0
Total Votes	0

Total		
Unresolved Write-In	0	



**Common Council - Hopewell Borough (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
David MACKIE	Dem	0	0	0	0	0	0	0
Krista WEAVER	Dem	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Common Council - Pennington Borough (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Charles "Chico" MARCIANTE	Dem	0	0	0	0	0	0	0
Katrina "Kati" ANGARONE	Dem	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Committee - Hopewell Township (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Courtney PETERS-MANNING	Dem	0	0	0	0	0	0	0
David CHAIT	Dem	0	0	0	0	0	0	0
Daniel J. HANLEY, Jr.	Rep	0	0	0	0	0	0	0
Jennifer DiDONATO	Rep	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

Total		
Times Cast	0 / 0	N/A

Candidate	Total
David MACKIE	0
Krista WEAVER	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Charles "Chico" MARCIANTE	0
Katrina "Kati" ANGARONE	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Courtney PETERS-MANNING	0
David CHAIT	0
Daniel J. HANLEY, Jr.	0
Jennifer DiDONATO	0
Total Votes	0

Total		
Unresolved Write-In	0	

## Members of the Board of Education - East Windsor Regional - East Windsor Township (Vote for 3)

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Bertrand B. FOUGNIES		0	0	0	0	0	0	0
Nicole LaRUSSO		0	0	0	0	0	0	0
Jagruti PATEL	AAA	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

## Members of the Board of Education - Ewing Township (Vote for 3)

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Michael S. MILLER	KCE	0	0	0	0	0	0	0
Nicole NW HARRIS		0	0	0	0	0	0	0
Daniel ANGEBRANNDT		0	0	0	0	0	0	0
Crystal L. FEDELI	FTC	0	0	0	0	0	0	0
Kurtis M. WARNER	FTC	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

## Member of the Board of Education - Ewing Township - 1 yr. Unexpired Term (Vote for 1)

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0



Total		
Times Cast	0 / 0	N/A

Candidate	Total
Bertrand B. FOUGNIES	0
Nicole LaRUSSO	0
Jagruti PATEL	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Michael S. MILLER	0
Nicole NW HARRIS	0
Daniel ANGEBRANNDT	0
Crystal L. FEDELI	0
Kurtis M. WARNER	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Total Votes	0

Total		
Unresolved Write-In	0	

**Members of the Board of Education - Hamilton Township (Vote for 3)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Stacy BYRNE	TEA	0	0	0	0	0	0	0
Monica QUASTE	TEA	0	0	0	0	0	0	0
Rocco RICCIO		0	0	0	0	0	0	0
Jason McSHEENE	EEE	0	0	0	0	0	0	0
Dina THORNTON		0	0	0	0	0	0	0
Alicia RAMOS		0	0	0	0	0	0	0
Dallas BARR		0	0	0	0	0	0	0
Christopher DRUDY	ACT	0	0	0	0	0	0	0
Stephanie WILLIAMS	BT	0	0	0	0	0	0	0
Frank SUMMERS	DT	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Member of the Board of Education - Hopewell Valley Regional - Hopewell Borough (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Mark J. PETERS		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Members of the Board of Education - Hopewell Valley Regional - Hopewell Township (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Michael James WILSON		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Stacy BYRNE	0
Monica QUASTE	0
Rocco RICCIO	0
Jason McSHEENE	0
Dina THORNTON	0
Alicia RAMOS	0
Dallas BARR	0
Christopher DRUDY	0
Stephanie WILLIAMS	0
Frank SUMMERS	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Mark J. PETERS	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Michael James WILSON	0
Total Votes	0

Total		
Unresolved Write-In	0	



**Members of the Board of Education - Lawrence Township (Vote for 3)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Michelle KING	BTT	0	0	0	0	0	0	0
Patricia "Pepper" EVANS	BTT	0	0	0	0	0	0	0
Amanda SANTOS	BTT	0	0	0	0	0	0	0
Carlos Raziel RODRIGUEZ	ASO	0	0	0	0	0	0	0
Thomas J. FIGUEIRA	QCF	0	0	0	0	0	0	0
Amy GREGORY	QCF	0	0	0	0	0	0	0
Nathanael GREGORY	QCF	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Members of the Board of Education - Princeton Public Schools (Vote for 3)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Susan KANTER		0	0	0	0	0	0	0
Lishian Lisa WU	TBP	0	0	0	0	0	0	0
Deborah BRONFELD		0	0	0	0	0	0	0
Dafna KENDAL	PSF	0	0	0	0	0	0	0
Margarita "Rita" RAFALOVSKY	TCE	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Michelle KING	0
Patricia "Pepper" EVANS	0
Amanda SANTOS	0
Carlos Raziel RODRIGUEZ	0
Thomas J. FIGUEIRA	0
Amy GREGORY	0
Nathanael GREGORY	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Susan KANTER	0
Lishian Lisa WU	0
Deborah BRONFELD	0
Dafna KENDAL	0
Margarita "Rita" RAFALOVSKY	0
Total Votes	0

Total		
Unresolved Write-In	0	

**Members of the Board of Education - Robbinsville Township (Vote for 3)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Christopher EMIGHOLZ	SCB	0	0	0	0	0	0	0
Raghu NANDAN	KCF	0	0	0	0	0	0	0
Jeffrey PIERRO	KCF	0	0	0	0	0	0	0
Peter J. OEHLBERG		0	0	0	0	0	0	0
Lauren PALUZZI	POS	0	0	0	0	0	0	0
Kerriann FOX	POS	0	0	0	0	0	0	0
Allison L. PRABHAKAR	POS	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Members of the Board of Education - West Windsor - Plainsboro Regional - West Windsor Township (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Louisa HO	ECI	0	0	0	0	0	0	0
Graelynn McKEOWN	ECI	0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Member of the Board of Education - West Windsor - Plainsboro Regional - West Windsor Township - 1 yr. Unexpired term (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Shwetha SHETTY		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0



Total		
Times Cast	0 / 0	N/A

Candidate	Total
Christopher EMIGHOLZ	0
Raghu NANDAN	0
Jeffrey PIERRO	0
Peter J. OEHLBERG	0
Lauren PALUZZI	0
Kerriann FOX	0
Allison L. PRABHAKAR	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Louisa HO	0
Graelynn McKEOWN	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Shwetha SHETTY	0
Total Votes	0

Total		
Unresolved Write-In	0	

**Fire Commissioner - Hopewell Borough (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Charles S. MOREHOUSE		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Fire Commissioner - Hopewell Borough - 1 yr. Unexpired Term (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
John W. BLASI		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Fire Commissioner - Hopewell Township (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Enrique RODRIGUEZ, Jr.		0	0	0	0	0	0	0
William E. MULLEN III		0	0	0	0	0	0	0
Christopher Paul JONES		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Charles S. MOREHOUSE	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
John W. BLASI	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Enrique RODRIGUEZ, Jr.	0
William E. MULLEN III	0
Christopher Paul JONES	0
Total Votes	0

Total		
Unresolved Write-In	0	



**Fire Commissioner - Pennington Borough (Vote for 2)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Robert M. DiFALCO		0	0	0	0	0	0	0
Brian HOFACKER		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Robbinsville Municipal Question #1 (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
YES		0	0	0	0	0	0	0
NO		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

**Robbinsville Municipal Question #2 (Vote for 1)**

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
YES		0	0	0	0	0	0	0
NO		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0

Total		
Times Cast	0 / 0	N/A

Candidate	Total
Robert M. DiFALCO	0
Brian HOFACKER	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
YES	0
NO	0
Total Votes	0

Total		
Unresolved Write-In	0	

Total		
Times Cast	0 / 0	N/A

Candidate	Total
YES	0
NO	0
Total Votes	0

Total		
Unresolved Write-In	0	

Trenton Municipal Question (Vote for 1)

		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Vot	Emergency	Federal
Times Cast		0	0	0	0	0	0	0
Candidate	Party	Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
YES		0	0	0	0	0	0	0
NO		0	0	0	0	0	0	0
Total Votes		0	0	0	0	0	0	0
		Election Day	Early Voting	Vote by Mail	Provisional	ICX - Early Voting	Emergency	Federal
Unresolved Write-In		0	0	0	0	0	0	0



		Total	
Times Cast		0 / 0	N/A

Candidate	Total	
YES	0	
NO	0	
Total Votes	0	

		Total	
Unresolved Write-In		0	

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Petitioners, Mercer  
County Superintendent of Elections  
and Mercer County Board of Elections  
R.J. Hughes Justice Complex  
PO Box 112  
25 Market Street  
Trenton, New Jersey 08625-0112

By: George N. Cohen  
Deputy Attorney General  
Attorney ID#002941985  
[George.Cohen@law.njoag.gov](mailto:George.Cohen@law.njoag.gov)  
(609)-376-2955

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION-MERCER COUNTY

Civil Action

IN THE MATTER OF THE MERCER	)	ORDER FOR THE OPENING OF
COUNTY SUPERINTENDENT OF	)	TABULATOR STORAGE COMPARTMENTS
ELECTIONS OPENING OF TABULATOR	)	FROM NOVEMBER 8, 2022 GENERAL
STORAGE COMPARTMENTS FROM	)	ELECTION
THE NOVEMBER 8, 2022	)	
GENERAL ELECTION	)	

This matter having been opened to the Court by Matthew J. Platkin, Attorney General of New Jersey, attorneys for Petitioners Mercer County Superintendent of Elections and Mercer County Board of Elections (referred together as "Board") (George N. Cohen, Deputy Attorney General, appearing), seeking an Order to permit the Board to immediately open the tabulator storage compartments used in the November 8, 2022 General Election, in order to determine if any cast ballots were inadvertently left in the

storage compartments, either in the main compartment or the emergency ballot compartment, and to retrieve any such cast ballots for canvassing by the Board of Elections; and

WHEREAS N.J.S.A. 19:52-6 requires an order from the Superior Court of New Jersey in order to open the tabulator storage compartments in question prior to 15 days after the locking of the tabulator storage compartments after the November 8, 2022 General Election, and the unlocking of the tabulator storage compartments is necessary in order to determine if any cast ballots remain in either of the two tabulator storage compartments; and

WHEREAS the Board assigns staff from different political parties to conduct the opening of the tabulator storage compartments in order to determine if any cast ballots remain in the tabulator storage compartments and said assigned staff will conduct the closure, locking and re-sealing of the tabulator storage compartments which will be secured in the voting machine warehouse; and

WHEREAS the opening of the tabulator ballot storage compartments and the retrieval of any cast ballots is necessary in order to ensure that all ballots cast in the November 8, 2022 General Election are properly canvassed;

IT IS on November 10, 2022 ;

ORDERED that the Board shall conduct the opening of the used in the November 8, 2022 General Election at the voting machine



warehouse using two staff members from different political party affiliation, in order to retrieve any cast ballots inadvertently left in the tabulator storage compartments so as to complete the review of all votes cast in the November 8, 2022 General Election; and

IT IS FURTHER ORDERED that the Board shall provide notice to the chairs of the Democratic and Republican county party committees as to the time and place of the opening of the tabulator storage compartments; and

IT IS FURTHER ORDERED that upon completion of the opening of the tabulator storage compartments and the retrieval of any cast ballots found in the tabulator ballot storage compartments, that the tabulator storage compartments will be immediately locked, re-sealed and remain secured for the remainder of the 15-day period as required by N.J.S.A. 19:52-6.

November 10, 2022 /s/ William Anklowitz, J.S.C.

Oral argument and reasons on the record.

**SECOND REQUEST****sent by Cert. Mail/RRR****February 1, 2023**

Mary Basile Logan  
65 Old Highway 22, Suite 5  
Clinton, New Jersey 08809  
(908) 200-7294  
trino@trinops.com

December 15, 2022

**Sent Via Certified Mail - RRR**

U.S. Department of Justice  
Kilian B. Kagle  
Civil Rights Division  
950 Pennsylvania Avenue, N.W.  
Office of the Assistant Attorney General, Main  
Washington, D.C. 20530

Re: Freedom of Information Act (FOIA) Request  
November 8, 2022 General Election

Dear Mr. Kagle:

Pursuant to the 1996 Electronic Freedom of Information Act, the Civil Rights Division FOIA Branch subject to the Public Release Statement of November 7, 2022, "for compliance with the federal voting rights laws on election day," and in accordance to the Freedom of Information Act, 5 U.S.C. § 552, as amended; I hereby request the following records be produced, in the original or common electronic format as enumerated below.

1. Incident report(s) generated subject of early voting location throughout the certification of the subject election of November 8, 2022.
2. Violation reports received from "call center" dedicated or a polling place wherein a county board of elections or superintendent of elections noticed your office during the early voting period, extending through final ballot counting and final election certification as any/all disruptions may have imposed. Responsive record request fulfillment to include any open matter, unresolved at the time of this request.
3. Protocols lateral and horizontal, in project management of incident handling/reporting/resolution.
4. Protocol interface with policing bodies, Attorneys General, Secretaries of State and Election designees in each of the jurisdiction States subject to Federal Court Order as to the outlined protocol during the November 8, 2022 general election.
5. Copies of Federal Court Orders for each federally monitored election Precinct, within each subject State from the November 8, 2022 general election.
6. Copies of emergent Federal Court Orders for each federally monitored election Precinct not subject of November 7, 2022 release statement but which such monitoring took place, specifically in New Jersey throughout the period of early voting and extending through election certification.

Page Two

December 15, 2022

DOJ/CRT FOIA Request – November 8, 2022 G.E.

7. Copies of communications, inclusive, supporting item 6, above, to include:
- a. inclusive of reports.
  - b. emergent protocols (end to end).
  - c. interface with policing bodies.

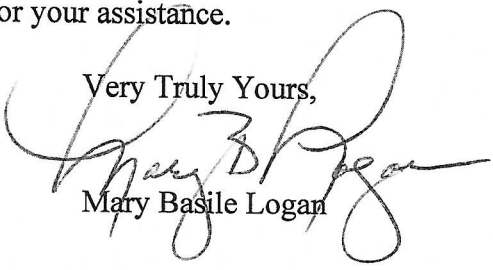
Citing the March 15, 2022, Freedom of Information Act Guidelines, 5 U.S.C. § 552, as amended and, specifically those protections of our societal bedrock as noted in *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), while such records may involve active investigations, as noted in *NLRB v. Robbins Tire & Rubber Co.*, 437 U.S. 214, 242 (1978), such exceptions and/or redactions should be constrained but for the law in transparency *New York Times Co. v. NASA*, 782 F. Supp. 628 (D.D.C. 1991). I am requesting that the responsive records be produced in the most convenient and expedient fulfillment venue. Electronic format reply via my personal email via my private company, secure at Trino@trinops.com. If there is expected to be a delay in providing a part of the requested records, kindly advise respecting staffing commitments.

If my request does not adequately describe the responsive records to be produced, please contact me via e-mail so that I may clarify my request, and when appropriate inform me of the manner in which records are filed, retrieved or generated.

Pursuant to FOIA, should a query of clarification not be received, I have a reasonable expectation of receiving the responsive records within ten (10) business days. I ask the courtesy of your reply or denial in writing, to include a reason of any denial in whole or part, or provide a date certain when such a response can be reasonably expected. If for any reason any portion of my request is denied, please inform me of same including the name, job title, address and e-mail address of the person or body to whom an appeal should be directed. Lastly, should any costs or fees be assessed for fulfillment, kindly advise.

Please feel free to contact me with any questions or suggestions that may help in fulfillment of this request. Thank you, in advance, for your assistance.

Very Truly Yours,

  
Mary Basile Logan



January 17, 2023 08:11 AM

State of New Jersey

Page: 1 of 2

Government Records Request

Receipt

**Requestor Information**

Mary Basile Logan

65 Old Highway 22, Suite 5

Clinton, NJ 08809

trino@trinops.com

908-200-7294

Request Date: January 15, 2023

Maximum Authorized Cost: \$100.00

Email

Request Number: W195879

Request Status: Denied Closed

Ready Date:

**Custodian Contact Information**

Division on Civil Rights

Records Custodian

PO Box 089

140 E. Front Street - 6th Floor

Trenton, NJ 08625-0089

dcr.records@lps.state.nj.us

609-984-3136

By

**Status of Your Request**

Your request for government records (# W195879) from the Division on Civil Rights has been reviewed and has been Denied Closed. Detailed information as to the availability of the documents you requested appear below and on following pages as necessary.

The cost and any balance due for this request is shown to the right. Any balance due must be paid in full prior to the release / mailing of the documents.

If you have any questions related to the disposition of this request please contact the Custodian of Records for the Division on Civil Rights. The contact information is in the column to the right. Please reference your request number in any contact or correspondence.

**Cost Information**

Total Cost: \$0.00

Deposit: \$0.00

Total Amount Paid: \$0.00

Balance Due: \$0.00

**Document Detail**

Div	Doc #	Doc Name	Redaction Req	Pages	Legal Size	Electronic Media	Other Cost
CR	00001	Denial	N		N	Y	
		Denial: 05.Exception by State Regulation (specify) --- Thank you for your OPRA request. Your request for DCR complaints is denied pursuant to N.J.A.C. 13:4-13.1, N.J.S.A. 47:1A-9(b) and North Jersey Media Group, Inc. v. Bergen County Prosecutor's Office, 447 N.J. Super. 182 (App. Div. 2016). The Division can neither confirm nor deny the existence of DCR complaints in response to your OPRA request. With regard to your other requests for records, DCR does not possess any records responsive to those requests. Your request is hereby closed. Thank you.					

January 17, 2023 08:11 AM

State of New Jersey

Page: 2 of 2

Government Records Request

Receipt

Thank you for your OPRA request. Your request for DCR complaints is denied pursuant to N.J.A.C. 13:4-13.1, N.J.S.A. 47:1A-9(b) and North Jersey Media Group, Inc. v. Bergen County Prosecutor's Office, 447 N.J. Super. 182 (App. Div. 2016). The Division can neither confirm nor deny the existence of DCR complaints in response to your OPRA request. With regard to your other requests for records, DCR does not possess any records responsive to those requests. Your request is hereby closed. Thank you.

Your request for government records (# W195879) is as follows:

Pursuant to the New Jersey Open Public Records Act (OPRA), New Jersey Statute 47:1A-13, and in accordance to N.J.S.A. 19:6-16(b), expressed in your correspondence of October 28, 2022, and October 27, 2022 I hereby request the following records be produced, in the original or common electronic format as described below: 3. Copy of any and inclusive complaints filed in the November, 2022 general election, extending to the Division of Civil Rights, OPIA, NJCCIC, Secretary of State (NJ), the federal Justice Department and Civil Rights Division subject records inclusive from the time period of October 29, 2022 (early voting) and extending through December 8, 2022, election certification, but should also include any such complaint are grievance open or pending from the subject election period. Request should include: Copies of protocols; lateral and horizontal, in project management of incident handling/reporting/resolution. Bilateral written communication in incident handling, escalation, and extinguishment or, as the case may be, legal pursuit. Copies of incident management reports. Kindly know that this request was first submitted to the Office of the Attorney General by letter dated December 15, 2022. By reply on January 12, 2023, their office directed me to forward the query to your office. Should you have any questions, please advise. Thank you, in advance.

January 24, 2023 04:03 PM

State of New Jersey  
Government Records Request  
Receipt

Page: 1 of 2

**Requestor Information**

Mary Basile Logan

65 Old Highway 22, Suite 5  
Clinton, NJ 08809

trino@trinops.com  
908-200-7294

Request Date: January 16, 2023

Maximum Authorized Cost: \$100.00

Email

Request Number: W195897

Request Status: Filled Closed

Ready Date:

**Custodian Contact Information**

Office of Homeland Security and Preparedness

Records Custodian

P.O. Box 091

25 Market Street

Trenton, NJ 08625-0091

ohsp.records@ohsp.state.nj.us

609-584-4346

By

*Randall A. Blanton*

**Status of Your Request**

Your request for government records (# W195897) from the Office of Homeland Security and Preparedness has been reviewed and has been Filled Closed. Detailed information as to the availability of the documents you requested appear below and on following pages as necessary.

The cost and any balance due for this request is shown to the right. Any balance due must be paid in full prior to the release / mailing of the documents.

If you have any questions related to the disposition of this request please contact the Custodian of Records for the Office of Homeland Security and Preparedness. The contact information is in the column to the right. Please reference your request number in any contact or correspondence.

**Cost Information**

Total Cost: \$0.00

Deposit: \$0.00

Total Amount Paid: \$0.00

Balance Due: \$0.00

**Document Detail**

Div	Doc #	Doc Name	Redaction Req	Legal Size	Electronic Media	Other Cost
-----	-------	----------	------------------	---------------	---------------------	---------------

----- No Document Detail -----

The NJCCIC had no responsive records to the requested information. Suggest requesting these documents from all the other agencies listed in the request. There were no complaints received by the NJCCIC or incidents reported.

Your request for government records (# W195897) is as follows:



January 24, 2023 04:03 PM

State of New Jersey

Page: 2 of 2

Government Records Request

Receipt

Originally sent to the Attorney General's office (12/15/22), this OPRA request has been redirected for fulfillment.

1. Comprehensive reports resulting from the November 8, 2022, general election, including early voting and extending through election certification, December 8, 2022 of the Office of Public Integrity and Accountability (OPIA) and New Jersey Cybersecurity and Communications Integrations Cell (NJCCIC). Request should include:?? Bilateral communication between the office of the Secretary of State and the federal Department of Justice, inclusive of the Civil Rights Division, Criminal Division, National Security Division and extending to the New Jersey office of the Attorney General.?? Copies of protocols; lateral and horizontal, in project management of incident handling/reporting/resolution.?? Communication on protocols resulting from the general election held November 8, 2022, inclusive of early voting and extending to certification December 8, 2022.?? Communication between New Jersey jurisdiction (Middlesex County, New Jersey) and the above parties, as well all other jurisdictions/precincts wherein federal entities were at any point present during the November, 2022 election cycle, including early voting and extending through election certification of December 8, 2022.?? Federal Court Order extending monitors from the Civil Rights Division and from the U.S. Attorney??s offices for each subject monitored jurisdiction/precinct.?? Communication between the New Jersey Secretary of State and the County Boards of Election and/or Clerk??s offices to include any policy/protocol or emergent change/adjustment or amendment which may have resulted during the general election, from early voting, day of November 8, 2022 and extending to certification on December 8, 2022.?? Incident reports involving the compliance monitoring in Middlesex County, New Jersey and any/all communication which may have resulted in such designees extending jurisdictional compliance monitoring more broadly on the day of the general election, November 8, 2022. 2. Copy of any and inclusive complaints filed in the November, 2022 general election, extending to the Division of Civil Rights, OPIA, NJCCIC, Secretary of State (NJ), the federal Justice Department and Civil Rights Division subject records inclusive from the time period of October 29, 2022 (early voting) and extending through December 8, 2022, election certification, but should also include any such complaint are grievance open or pending from the subject election period. Request should include:?? Copies of protocols; lateral and horizontal, in project management of incident handling/reporting/resolution.?? Bilateral written communication in incident handling, escalation, and extinguishment or, as the case may be, legal pursuit.?? Copies of incident management reports. I am requesting that these records be produced in the most convenient format in keeping with the OPRA Request Submission statutes (New Jersey Statute ??47:1A-5g). Electronic format reply via my personal email via my private company, secure at Trino@trinops.com. If there is expected to be a delay in providing a part of the requested records, kindly advise respecting staff commitments. Pursuant to OPRA, within five business days of the receipt of this request, I ask the courtesy of your reply or denial in writing, to include a reason of any denial in whole or part, or provide a date certain when such a response can be reasonably expected. If for any reason any portion of my request is denied, please inform me of same including the name, job title, address and e-mail address of the person or body to whom an appeal should be directed. Please feel free to contact me with any questions or suggestions that may help in fulfillment of this request. Thank you, in advance, for your assistance.

January 24, 2023 01:26 PM

State of New Jersey

Page: 1 of 2

Government Records Request  
Receipt

**Requestor Information**

Mary Basile Logan

65 Old Highway 22, Suite 5  
Clinton, NJ 08809

trino@trinops.com  
908-200-7294

Request Date: January 16, 2023

Maximum Authorized Cost: \$100.00

Email

Request Number: W195894

Request Status: Denied Closed

Ready Date: January 24, 2023

**Custodian Contact Information**

Division of Criminal Justice  
Records Custodian

PO Box 085  
25 Market Street - 5th Floor West  
Trenton, NJ 08625-0085  
dcj.records@lps.state.nj.us  
609-984-6500

By

**Status of Your Request**

Your request for government records (# W195894) from the Division of Criminal Justice has been reviewed and has been Denied Closed. Detailed information as to the availability of the documents you requested appear below and on following pages as necessary.

The cost and any balance due for this request is shown to the right. Any balance due must be paid in full prior to the release / mailing of the documents.

If you have any questions related to the disposition of this request please contact the Custodian of Records for the Division of Criminal Justice. The contact information is in the column to the right. Please reference your request number in any contact or correspondence.

**Cost Information**

Total Cost: \$0.00

Deposit: \$0.00

Total Amount Paid: \$0.00

Balance Due: \$0.00

**Document Detail**

Div	Doc #	Doc Name	Redaction Req	Pages	Legal Size	Electronic Media	Other Cost
CJ	0001	See full request language below.	N		N	N	
		Denial: 01.Not Made, Maintained, Filed or Received by Division ---					

The Division of Criminal Justice is in receipt of your OPRA request. The Division does not make or maintain records responsive to your request, therefore it is denied.

This request is considered closed at this time.

January 24, 2023 01:26 PM

State of New Jersey

Page: 2 of 2

Government Records Request

Receipt

Your request for government records (# W195894) is as follows:

AG Platkin directed this request be sent to your office, as below. 1. List of attorneys and report(s) generated subject of the attorneys from the Division of Law, addressing ??emergent queries?? and extending to communications by and between County election officials throughout early voting, Election day (November 8, 2022) and through certification of the subject election, December 8, 2022. Including?? Copies of protocols; lateral and horizontal, in project management of incident handling/reporting/resolution.?? Enumerated incidents ?? comprehensive list of queries, coordinated responses and action(s) taken.?? Communications comprised specific to incident precinct location, designated by County, Precinct, or other official designee.?? Reason for request of dispatch, should query(ies) have warranted.?? Name of the police or law enforcement officer dispatched including badge number.?? Resolution report of each such enumerated incident(s).



January 13, 2023 02:34 PM

State of New Jersey

Page: 1 of 2

Government Records Request

Receipt

**Requestor Information**

Mary B Logan  
Trino Paralegal Services, LLC  
65 Old Highway 22, Suite 5  
Clinton, NJ 08809

trino@trinops.com  
908-200-7294

Request Date: January 4, 2023

Maximum Authorized Cost: \$.00

Email

Request Number: C195424

Request Status: Denied Closed

Ready Date: January 13, 2023

**Custodian Contact Information**

Office of the Attorney General

Records Custodian

PO Box 081

25 Market Street - 3rd Floor West

Trenton, NJ 08625-0081

oag.records@njoag.gov

609-984-6998

By

**Status of Your Request**

Your request for government records (# C195424) from the Office of the Attorney General has been reviewed and has been Denied Closed. Detailed information as to the availability of the documents you requested appear below and on following pages as necessary.

The cost and any balance due for this request is shown to the right. Any balance due must be paid in full prior to the release / mailing of the documents.

If you have any questions related to the disposition of this request please contact the Custodian of Records for the Office of the Attorney General. The contact information is in the column to the right. Please reference your request number in any contact or correspondence.

**Cost Information**

Total Cost: \$0.00

Deposit: \$0.00

Total Amount Paid: \$0.00

Balance Due: \$0.00

**Document Detail**

Div	Doc #	Doc Name	Redaction Req	Pages	Legal Size	Electronic Media	Other Cost
OAG	001	List of attorneys & report(s) generated subject of the attorneys from the Division of Law, addressing "emergent queries" & extending to communications by & between County election officials throughout early voting, Election day 11/8/2022 & through certification of subject election, 12/8/2022.  	N		N	N	
		Denial: 01.Not Made, Maintained, Filed or Received by Division ---					

January 13, 2023 02:34 PM

State of New Jersey

Page: 2 of 2

Government Records Request

Receipt

The Department of Law & Public Safety, Office of the Attorney General (OAG), is in receipt of your request, which is reprinted below. As noted in this office's email to you, your request, which was received via hard copy correspondence, was split into three separate requests to allow for entry into the OPRA tracking system.

Please be advised that to the extent your request seeks records related to the election cycle assignment of attorneys from within the Division of Law, including communications between Division of Law Attorneys and county election officials, be advised that the OAG does not possess responsive records. To the extent that any such records may exist, they would be within the possession of the Division of Law, a separate division within the Department of Law and Public Safety. The Division of Law maintains its own records and has a separate Records Custodian. Department regulations do not permit me to transfer a request, you may therefore wish to resubmit directly to the Division of Law via the online form: [https://www-njlib.state.nj.us/NJ\\_OPRA/departement.jsp](https://www-njlib.state.nj.us/NJ_OPRA/departement.jsp). Select "Department of Law and Public Safety." Next, select "Division of Law." Your request with OAG is hereby closed.

Sincerely,  
Ivonnely Colon-Fung  
OAG Custodian of Records

Your request for government records (# C195424) is as follows:

List of attorneys and report(s) generated subject of the attorneys from the Division of Law, addressing "emergent queries" and extending to communications by and between County election officials throughout early voting, Election day (November 8, 2022) and through certification of the subject election, December 8, 2022.

Request should include:

- Copies of protocols; lateral and horizontal, in project management of incident handling/reporting/resolution.
- Enumerated incidents - comprehensive list of queries, coordinated responses and action(s) taken.
- Communications comprised specific to incident precinct location, designated by County, Precinct, or other official designee.
- Reason for request of dispatch, should query(ies) have warranted.
- Name of the police or law enforcement officer dispatched including badge number.
- Resolution report of each such enumerated incident(s).

Mary Basile Logan  
65 Old Highway 22, Suite 5  
Clinton, New Jersey 08809  
(908) 200-7294  
trino@trinops.com

December 15, 2022

**Sent Via Certified Mail - RRR**

Mercer County Board of Elections

Honorable Board Members: Mary Corrigan, Jill Moyer and Charles Farina  
930 Spruce St.

Lawrence, New Jersey 08648

Re: Open Public Records Act (OPRA) Request  
REPORTS under N.J.S.A. 19:6-16(b)  
November 8, 2022 General Election

Dear Honorable Board Members:

Pursuant to the New Jersey Open Public Records Act ("OPRA"), New Jersey Statute §47:1A-13, in accordance with content of Matthew J. Platkin, New Jersey Attorney General, communication of October 27, 2022 as to the subject general election and the emergent circumstances specific to Mercer County, I hereby request the following records be produced, in the original or common electronic format as described below:

1. Incident report(s) generated subject of early voting location or a polling place wherein a county board of elections or superintendent of elections noticed your office during the period of October 29, 2022 through final counting or certification as any/all disruptions may have imposed. Responsive record request fulfillment to include any open matter, unresolved at the time of this request.

Request should include:

- Copies of protocols; lateral and horizontal, in project management of incident handling/reporting/resolution.
- Polling place location identification.
- Reports of violations from Mercer County to the Attorney General, Office of Public Integrity and Accountability.
- Reason for dispatch, as may have been deemed necessary.
- Name of the police or law enforcement officer dispatched including badge number.
- Resolution report of each such incident.



Page Two  
December 15, 2022

2. Kindly provide full chain of custody within Mercer County of inclusive ballots from the time the ballots left the County Precinct until their arrival in Trenton for mass scanning. The chain of custody should include:

- The persons's name and custodial signatures for receipt and transfer of said ballots.
- All security codes associated with each ballot storage lock associated with the storage containers of ballots between the Precinct and/or County Office and arrival at the Trenton scanning facility.
- List of approved mass scanner operator(s), including any W9's for temporary staff such reports could include overtime records if staff were utilized.
- Copy of Bipartisan Commission directory and contact information having served as an interim ballot processing team, inclusive of their certifications as designees of the Mercer County Clerk.

3. Copy of inclusive approved emergent election change protocols citing the ballot scanning being inoperable.

Request should include:

- Copies of protocols, lateral and horizontal, in project management of incident handling/reporting/resolution.
- Ballot storage identification, including signatures of lock code verifications.
- Vehicle identification for transport of locked ballot boxes with CoC in delivery and signatures on receiving end, in Trenton.
- Federal Court Order as may have been deemed necessary citing the emergent circumstances.
- Copy of inclusive adjudication reports and ballot curing reports.
- Copy of provisional ballot reports.
- Copy of election Judge log reports as may have been required for curing confirmation.
- Copy of inclusive written communications, internal and external, as to the nature and resolve of the emergent circumstances, including federal/state and County officials as may have been deemed necessary.

4. Copy of vendor printing Contract (Royal Printing Company) and sample ballots for the subject general election.
5. Copy of Dominion consent agreement authorizing ballots for the subject election and the certification in advance of the general election with full CoC.
6. Copy of all election test detailing and reports generated, seven (7) days prior to the general election, including sample ballot run.

Page Three  
November 15, 2022

7. Court Order resulting from emergent hearing regarding opening the vote tabulators, resulting CoC and custody records inclusive of persons involved in process. This record should include emergent protocol, end to end, ensuring clean CoC of the sovereign ballots in question.

Citing the March 15, 2022, Freedom of Information Act Guidelines, 5 U.S.C. § 552, as amended and, specifically those protections of our societal bedrock as noted in *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), while such records may involve active investigations, as noted in *NLRB v. Robbins Tire & Rubber Co.*, 437 U.S. 214, 242 (1978), such exceptions and/or redactions should be constrained but for the law in transparency *New York Times Co. v. NASA*, 782 F. Supp. 628 (D.D.C. 1991). I am requesting that the responsive records be produced in the most convenient and expedient fulfillment venue. Electronic format reply via my personal email via my private company, secure at Trino@trinops.com. If there is expected to be a delay in providing a part of the requested records, kindly advise respecting staffing commitments.

If my request does not adequately describe the records to be produced, please contact me via e-mail so that I may clarify my request, and when appropriate inform me of the manner in which records are filed, retrieved or generated.

Pursuant to OPRA, within five business days of the receipt of this request, I ask the courtesy of your reply or denial in writing, to include a reason of any denial in whole or part, or provide a date certain when such a response can be reasonably expected. If for any reason any portion of my request is denied, please inform me of same including the name, job title, address and e-mail address of the person or body to whom an appeal should be directed.

Please feel free to contact me with any questions or suggestions that may help in fulfillment of this request. Thank you, in advance, for your assistance.

Very Truly Yours,



Mary Basile Logan

Mary Basile Logan  
65 Old Highway 22, Suite 5  
Clinton, New Jersey 08809  
(908) 200-7294  
trino@trinops.com

December 15, 2022

**Sent Via Certified Mail - RRR**

U.S. Department of Justice  
Kilian B. Kagle  
Civil Rights Division  
950 Pennsylvania Avenue, N.W.  
Office of the Assistant Attorney General, Main  
Washington, D.C. 20530

Re: Freedom of Information Act (FOIA) Request  
November 8, 2022 General Election

Dear Mr. Kagle:

Pursuant to the 1996 Electronic Freedom of Information Act, the Civil Rights Division FOIA Branch subject to the Public Release Statement of November 7, 2022, "for compliance with the federal voting rights laws on election day," and in accordance to the Freedom of Information Act, 5 U.S.C. § 552, as amended; I hereby request the following records be produced, in the original or common electronic format as enumerated below.

1. Incident report(s) generated subject of early voting location throughout the certification of the subject election of November 8, 2022.
2. Violation reports received from "call center" dedicated or a polling place wherein a county board of elections or superintendent of elections noticed your office during the early voting period, extending through final ballot counting and final election certification as any/all disruptions may have imposed. Responsive record request fulfillment to include any open matter, unresolved at the time of this request.
3. Protocols lateral and horizontal, in project management of incident handling/reporting/resolution.
4. Protocol interface with policing bodies, Attorneys General, Secretaries of State and Election designees in each of the jurisdiction States subject to Federal Court Order as to the outlined protocol during the November 8, 2022 general election.
5. Copies of Federal Court Orders for each federally monitored election Precinct, within each subject State from the November 8, 2022 general election.
6. Copies of emergent Federal Court Orders for each federally monitored election Precinct not subject of November 7, 2022 release statement but which such monitoring took place, specifically in New Jersey throughout the period of early voting and extending through election certification.



Page Two

December 15, 2022

DOJ/CRT FOIA Request – November 8, 2022 G.E.

7. Copies of communications, inclusive, supporting item 6, above, to include:
- a. inclusive of reports.
  - b. emergent protocols (end to end).
  - c. interface with policing bodies.

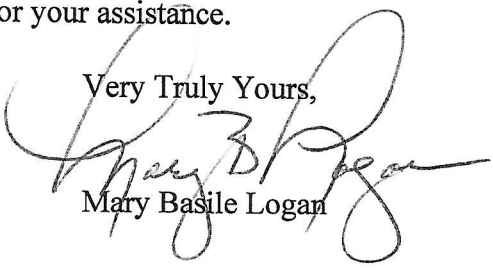
Citing the March 15, 2022, Freedom of Information Act Guidelines, 5 U.S.C. § 552, as amended and, specifically those protections of our societal bedrock as noted in *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), while such records may involve active investigations, as noted in *NLRB v. Robbins Tire & Rubber Co.*, 437 U.S. 214, 242 (1978), such exceptions and/or redactions should be constrained but for the law in transparency *New York Times Co. v. NASA*, 782 F. Supp. 628 (D.D.C. 1991). I am requesting that the responsive records be produced in the most convenient and expedient fulfillment venue. Electronic format reply via my personal email via my private company, secure at Trino@trinops.com. If there is expected to be a delay in providing a part of the requested records, kindly advise respecting staffing commitments.

If my request does not adequately describe the responsive records to be produced, please contact me via e-mail so that I may clarify my request, and when appropriate inform me of the manner in which records are filed, retrieved or generated.

Pursuant to FOIA, should a query of clarification not be received, I have a reasonable expectation of receiving the responsive records within ten (10) business days. I ask the courtesy of your reply or denial in writing, to include a reason of any denial in whole or part, or provide a date certain when such a response can be reasonably expected. If for any reason any portion of my request is denied, please inform me of same including the name, job title, address and e-mail address of the person or body to whom an appeal should be directed. Lastly, should any costs or fees be assessed for fulfillment, kindly advise.

Please feel free to contact me with any questions or suggestions that may help in fulfillment of this request. Thank you, in advance, for your assistance.

Very Truly Yours,



Mary Basile Logan

State of New Jersey  
Government Records Request Form

Important Notice

The [GRC site](#) contains important information related to your rights to request government records. Please read it carefully. [Instructions](#) to complete the form are available.  
At this time, not all State agencies are able to accept online requests. If the agency is not listed here, visit the [agency web sites](#) for instructions and forms.

**You have entered the following request information.**  
Please verify for correctness and submit or revise using the buttons at the bottom of the page.

The following Request for Information will be forwarded to  
**Human Services/ DHS-Central Office.**

Requestor Information

<b>First Name</b>	<b>MI</b>	<b>Last Name</b>	
Mary		Basile Logan	
<b>Company</b>			
<b>Mailing Address</b>			
65 Old Highway 22, Suite 5			
<b>City</b>	<b>State</b>	<b>ZIP</b>	
Clinton	New Jersey	08833 -	
<b>Email</b>			
trino@trinops.com			
<b>Day Time Telephone:</b>	<b>Area Code</b>	<b>Number</b>	<b>Extension</b>
	908	200 - 7294	
<b>Preferred Delivery:</b> E-Mail			
Under penalty of N.J.S.A. 2C:28-3, I certify that I <b>Have Not</b> been convicted of any indictable offense under the laws of New Jersey, or any other state, or in United States.			
<b>Record Request Information:</b>			
Good afternoon. I am seeking an electronic copy of the comprehensive list of inclusive dates on which citations were issued to the Paramus Veterans Memorial Home, Paramus, Bergen County, New Jersey between March 2020 – October 2020 by inspectors from the NJ Department of Health. Should you have any questions regarding this request, kindly advise. Thanking you, in advance, for your time and courtesies.			

Payment Information

<b>Maximum Authorized Cost:</b>
\$ 100.00
<b>Payment Method:</b>
Cash
<b>Fees:</b>
Letter Size @ \$0.05/page
Legal Size @ \$0.07/page
Electronic shall be provided free of Records: charge, but agency may charge for cost of media, programming, clerical, supervisory assistance and/or substantial use of information technology.
<b>Delivery:</b> Delivery / postage fees additional depending upon delivery type.
Additional may be charged if Charges: extraordinary time/effort required, depending upon request.

Accept

Revise

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Washington Examiner  
PRESENTS

RESTORING  
AMERICA



Fentanyl

## Enough fentanyl stopped at border in past year to kill every American 18 times

By Anna Giaritelli, Homeland Security Reporter October 21, 2023 03:13 PM



Fentanyl

## Enough fentanyl stopped at border in past year to kill every American 18 times

By Anna Giaritelli, Homeland Security Reporter  
October 21, 2023 03:13 PM



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### More from Examiner

Wokeness wrecked Disney. What's next?

December 16, 2023 06:00 AM

Veterans should be allowed to use private services to get benefits

December 16, 2023 06:00 AM

San Francisco sees record number of fatal drug overdoses in 2023

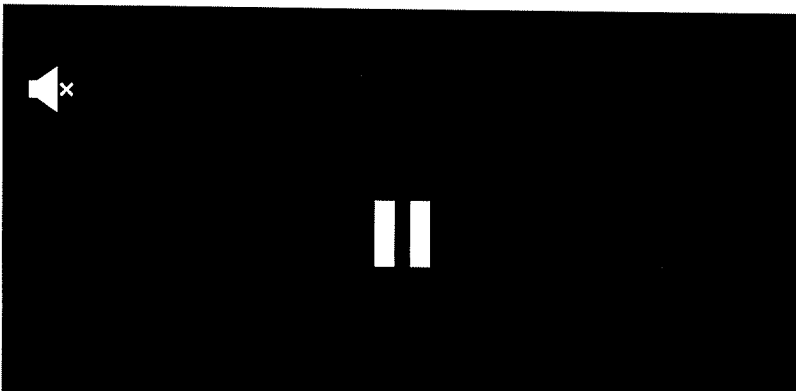
December 15, 2023 06:50 PM

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### Opinion

AirTags won't solve the crime crisis in Washington

By: Rep. Mike Collins





**NCDAS**National Center for  
Drug Abuse Statistics

Search



DONATE

OVERDOSE  
DEATHSCOST OF  
REHABOPIOID  
CRISIS

YOUTH

PRESCRIPTION  
MISUSE

ALCOHOL

# Drug Use Among Youth: Facts & Statistics

*Youth drug abuse is a high-profile public health concern, with at least **1-in-8** teenagers abusing an illicit substance in the last year.*

## Key Findings

**61%**

How much drug use went up among 8th graders between 2016 and 2020.

**62%**

Of teenagers in 12th grade have abused alcohol.

**50%**

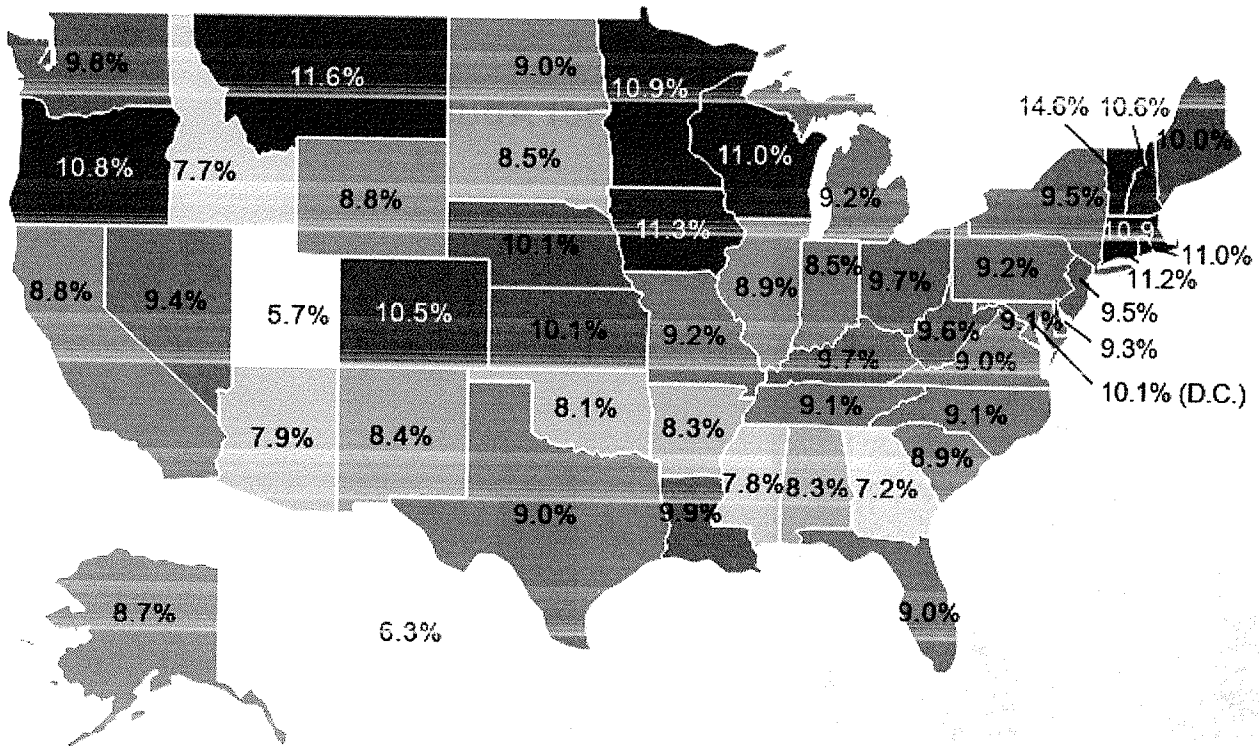
Of teenagers have misused a drug at least once.

Jump to state-level statistics: [AL](#) | [AK](#) | [AZ](#) | [AR](#) | [CA](#) | [CO](#) | [CT](#) | [DE](#) | [FL](#) | [GA](#) | [HI](#) | [ID](#) | [IL](#) | [IN](#) | [IA](#) | [KS](#) | [KY](#) | [LA](#) | [ME](#) | [MD](#) | [MA](#) | [MI](#) | [MN](#) | [MS](#) | [MO](#) | [MT](#) | [NE](#) | [NV](#) | [NH](#) | [NJ](#) | [NM](#) | [NY](#) | [NC](#) | [ND](#) | [OH](#) | [OK](#) | [OR](#) | [PA](#) | [RI](#) | [SC](#) | [SD](#) | [TN](#) | [TX](#) | [UT](#) | [VT](#) | [VA](#) | [WA](#) | [WV](#) | [WI](#) | [WY](#)



- By the time they're in 12<sup>th</sup> grade, 46.6% of teens have tried illicit drugs.
- 11.89 million 18- to 25-year-olds used drugs in the last month.
- 4,777 Americans aged 15 to 24 years old died of an overdose of illicit drugs in one year.
- 11.2% of overdose deaths are aged 15 to 24 years.

## Alcohol Use in the Last Month Among 12- to 17-year-olds



## Youth Alcohol Abuse

Alcohol is by far the most commonly abused substance among teens and young adults.

- 1.19 million 12- to 17-year-olds report binge drinking in the last month.
- 11.72 million 18- to 25-year-olds report binge drinking in the last month.
- 7.10 million 12- to 20-year-olds report drinking in the last month.
- Among them, 60.2% report binge drinking during that period.
- 25.6% of 8<sup>th</sup> graders have abused alcohol at least once.





OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

---

December 1, 2022

Ms. Donna Coons  
10 Stirling Road  
Bernardsville, NJ 07924

via email: [donna.coons1@coonsmd.com](mailto:donna.coons1@coonsmd.com)

RE: OIG FOIA No. 2023-IGFP-00127

Dear Ms. Coons:

This responds to your November 26 Freedom of Information Act (FOIA) request to the U.S. Postal Service Office of Inspector General (OIG) for copies of inclusive ballot imaging of and related to the November 2022 General Election, Vote by Mail Ballot Imaging for the state of New Jersey. Also included in the envelope with your request was a 16GB flash drive.

FOIA is about records we have in our possession. The OIG does not maintain the records you are seeking; therefore, we cannot assist you with this matter.

The FOIA provides only for disclosing federal agency records and does not require government agencies to answer questions, conduct unreasonably burdensome research, or create records. The FOIA sheds light on an agency's performance of its statutory duties. The FOIA provides that any person has a right, enforceable in court, to obtain access to federal agency records, unless such records (or portions of them) are protected from public disclosure by one of nine exemptions or by one of three special law enforcement record exclusions.

The U.S. Postal Service comprises the Postal Service, the U.S. Postal Inspection Service (USPIS); the Postal Rate Commission (PRC); and the OIG; each with its own area of responsibility and individual FOIA office.

The Postal Service Records Office establishes procedures to ensure Postal Service records management practices comply with both the FOIA and Privacy Act. The Records Office, along with the St Louis Requester Service Center, is the designated custodian for non-law enforcement Postal Service records; including but not limited to contracting and personnel records. Additional information regarding the Postal Service FOIA program can be found at <https://about.usps.com/who-we-are/foia/welcome.htm>.

The USPIS is the designated custodian for postal records relating to Postal Service law enforcement issues. The USPIS is a federal law enforcement entity charged with enforcing the Federal statutes involving mail fraud, illegal drugs, external mail theft, and other postal crimes, including revenue deficiencies, and are responsible for safety and security of all postal employees and facilities. Additional information regarding the USPIS FOIA program can be found at [Terms of Service and Legal | USPIS](#).

The OIG is an independent agency, created in 1997, with oversight authority over audits and investigations of Postal and Inspection Service fraud, abuse, and misconduct. The OIG's



mission is to prevent, detect, and report fraud, theft, and misconduct, and promote efficiency in the operation of the Postal Service. Prior to this time, Postal Service audits and investigations were conducted by the USPIS.

While the OIG has “oversight authority” for activities of the above referenced entities, the OIG is a separate agency and does not have management authority over the daily operations of either the Postal Service or USPIS. In addition, the OIG FOIA office does not have access to records maintained by the Postal Service or UPSIS and cannot direct either FOIA office to release records under their control. Likewise, the OIG Deputy General Counsel has no authority to review FOIA determinations issued by the Postal Service or USPIS.

Because you are seeking records potentially maintained by the Postal Service, we have referred your request to their FOIA office for processing and direct response to you. If you have questions regarding this referral, please contact them online at <https://pfoiapal.usps.com/>, via email at [foia12@usps.gov](mailto:foia12@usps.gov), via phone at (202) 268-2608, via fax at (202) 268-5353, or in writing at:

Manager Records Office  
U.S. Postal Service  
475 L'Enfant Plaza SW, Room 1P830  
Washington, DC 20260-1101

If you have questions regarding the processing of this request, please submit them in writing to [foia@uspsoig.gov](mailto:foia@uspsoig.gov). We will provide you an answer within two working days. You may also contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001, e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

As this completes our work on your request, we are closing your file here.

Sincerely,

USPS OIG FOIA Team

PRIVACY AND RECORDS MANAGEMENT OFFICE



December 5, 2022

Via Email: [donna.coons1@coonsmd.com](mailto:donna.coons1@coonsmd.com)

Donna Coons  
10 Stirling Road  
Bernardsville, NJ 07924

RE: FOIA Case No. 2023-FPRO-00417

Dear Ms. Coons:

This responds to your Freedom of Information Act (FOIA) request dated December 1, 2022, in which you seek access to Postal Service records. Specifically, you request:

Copies of inclusive ballot imaging of and related to the November, 2022 general election, VOTE BY MAIL BALLOT IMAGING. Imaging confined to the populous of the State of New Jersey only. Imaging to be provided by thumb drive or excel, whichever is best suited. Copy of any non-confidential reporting associated with the final ballot imaging count records.

With regards to your request, there are no records responsive. In order to have an image of a ballot, that would mean we would open the envelope, to which we do not do. Additionally, the Postal Service delivers more mail to more addresses in a larger geographical area than any other post in the world. We deliver to nearly 153 million addresses in every state, city and town in the country and process billions of mail pieces each year. A single mail facility typically processes tens of thousands of mail pieces every day. In light of our volume of mail, your request is extremely broad. To search for images of the mail, even at a single facility, would require extensive manual searches of a number of postal machines, which would be both extremely time consuming and costly. Please note that even if a search were conducted, it would not likely yield responsive documents because the majority of mail images are retained for a matter of minutes.

Frequent misconceptions are that the various records at these facilities are centrally indexed. Because this is not true, we consider your request to be so broad in scope that we are unable to comply. Under the FOIA, a request "shall identify the record sought as completely as possible, by name, description, or subject matter, and be sufficient to permit the custodian to locate it with a reasonable amount of effort. In extraordinarily onerous cases, as is your request, the FOIA does not require agencies to conduct a search for records that is of such range or magnitude as to make it "unreasonably burdensome." As a result, we are unable to fulfill a request for images and other records of all mail directed to a specified address.

We do offer a mail tracking service for Certified Mail, Priority Mail, Priority Mail Express, Signature Confirmation, Registered Mail, etc. by labeling the mail item with a unique label number. In the future, should you need to retrieve the delivery status of any such item, please call our toll-free number 1-800-222-1811 or follow the link on our website at <http://www.usps.com/shipping/trackandconfirm.htm>. Then, enter the unique label number(s) in the "USPS Tracking" box to obtain delivery information.

As information, the USPS Mail Isolation, Control and Tracking (MICT) program refers to a set of safety procedures developed in response to the anthrax mailings that occurred in October of 2001. To clarify the true nature of these procedures, they are now referred to separately as "mail isolation and control" and "mail tracing." "Mail isolation and control" procedures are primarily conducted by USPS employees whereas "mail tracing" is an investigative technique used by the United States Postal Inspection Service. The purpose of both is to protect Postal Service employees and the American public in the event a known contaminated piece

475 L'Enfant Plaza SW, Rm. 1P830  
Washington DC 20260-1101  
Phone: 202.268.2608; Fax: 202.268.5353

of mail has been processed through postal equipment. As such, information is available to law enforcement only.

After a contaminated mail piece is identified, Postal Service employees use "mail isolation and control" procedures to identify, locate, and recall, if necessary, any additional mail and equipment that is potentially contaminated. The employees primarily rely on transportation and vehicle route data to locate potentially contaminated mail and equipment so that it can be isolated and appropriate health and safety measures can be taken.

"Mail tracing" refers to an investigative technique utilized by the United States Postal Inspection Service to trace the path of potentially contaminated mail pieces through the mail stream and to help locate the possible source of the contamination. Much of this gathered information serves a law enforcement purpose and it may be used in subsequent criminal prosecutions. One technology used when such procedures are initiated is "mail imaging." "Mail imaging" performed by USPS automation equipment is an operational tool that was developed in the 1990's specifically to enable the automated sortation of mail and thereby maximize efficiency and potential cost savings. The vast majority of digital images created by USPS automation equipment simply serve a processing function and they are maintained for less than three minutes. However, some of those mail images can be retained for longer periods of time based on specific requests made to meet a variety of USPS operational needs. Otherwise, the Postal Service does not routinely compile those digital images of mail and it does not store them in a central database.

If you are not satisfied with the response to this request, you may file an administrative appeal within ninety (90) days of the date of this response letter by writing to the General Counsel U.S. Postal Service 475 L'Enfant Plaza SW Washington, DC 20260 or via email at [FOIAAppeal@usps.gov](mailto:FOIAAppeal@usps.gov). Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of the response to your request. The letter of appeal should include, as applicable:


- 1) A copy of the request, of any notification of denial or other action, and of any other related correspondence;
- 2) The FOIA tracking number assigned to the request;
- 3) A statement of the action, or failure to act, from which the appeal is taken;
- 4) A statement identifying the specific redactions to responsive records that the requester is challenging;
- 5) A statement of the relief sought; and
- 6) A statement of the reasons why the requester believes the action or failure to act is erroneous.

For further assistance and to discuss any aspect of your request, you may contact FOIA Public Liaison listed below:

PRIVACY & RECORDS OFFICE  
US POSTAL SERVICE  
475 L'ENFANT PLAZA SW RM 1P830  
WASHINGTON DC 20260-1101  
Phone: (202) 268-2608  
Fax: (202) 268-5353  
FOIA Public Liaison: Nancy P. Chavannes

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,

  
Marthea Hodge



Sr. Government Information Specialist



HOUSE COMMITTEE ON  
**OVERSIGHT AND REFORM**  
CHAIRWOMAN **CAROLYN B. MALONEY**

(/web/20221221132113/https://oversight.house.gov/)



(https://web.archive.org/web/20221221132113/https://oversight.house.gov/news/press-releases/pelosi-maloney-joined-by-173-house-democrats-in-call...)

## Pelosi, Maloney Joined by 173 House Democrats in Calling on Postmaster General to Reverse Assault on Postal Service

Aug 12, 2020 | Press Release

Washington, D.C. – In a new letter to Postmaster General Louis DeJoy, House Speaker Nancy Pelosi, Committee on Oversight and Reform Chairwoman Carolyn Maloney and 173 other House Democrats today called for the reversal of policies that have worsened the crisis facing the Postal Service and exacerbated a dramatic increase in delayed and undelivered mail.

In the letter, the Members wrote, “[T]he United States Postal Service is a pillar of our American Democracy that is enshrined in the Constitution, which empowers Congress to ‘establish Post Offices and Post Roads.’ The Postal Service provides critical services for the American people: delivering medicine to seniors, paychecks to workers, tax refunds to millions and absentee ballots to voters.

“It is always essential that the Postal Service be able to deliver mail in a timely and effective manner. During the once-in-a-century health and economic crisis of COVID-19, the Postal Service’s smooth functioning is a matter of life-or-death, and is critical for protecting lives, livelihoods and the life of our American Democracy.”

Below is the text of the letter

(https://web.archive.org/web/20221221132113/https://www.speaker.gov/sites/speaker.house.gov/files/documents to the Postmaster General.

\* \* \*

August 12, 2020

Louis DeJoy  
Postmaster General  
U.S. Postal Service

475 L'Enfant Plaza West, S.W.  
Washington, DC 20260

Dear Postmaster General:

We write to follow up on the letter that was sent on August 6 to you regarding many serious concerns about operational changes that you have implemented since assuming the position of Postmaster General, which have worsened the crisis facing the Postal Service, and specifically have exacerbated a dramatic increase in delayed and undelivered mail impacting mail delivery times and quality of service for Americans. We wrote last week, and sadly, the letter sent today to the Oversight Committee is insufficient.

As you know, the United States Postal Service is a pillar of our American Democracy that is enshrined in the Constitution, which empowers Congress to "establish Post Offices and Post Roads." The Postal Service provides critical services for the American people: delivering medicine to seniors, paychecks to workers, tax refunds to millions and absentee ballots to voters.

It is always essential that the Postal Service be able to deliver mail in a timely and effective manner.

During the once-in-a-century health and economic crisis of COVID-19, the Postal Service's smooth functioning is a matter of life-or-death, and is critical for protecting lives, livelihoods and the life of our American Democracy.

The House is seriously concerned that you are implementing policies that accelerate the crisis at the Postal Service, including directing Post Offices to no longer treat all election mail as First Class. If implemented now, as the election approaches, this policy will cause further delays to election mail that will disenfranchise voters and put significant financial pressure on election jurisdictions. Because many states have traditionally allowed voters to request absentee ballot applications and absentee ballots within a few days of the election, it is essential that standard delivery times remain short and pricing remain consistent.

We also remain concerned about a significant operational restructuring, done without any apparent analysis and consultation, which will



weaken the ability of the Postal Service to respond to local needs. These changes were made without sufficient consultation with Congress, and include reductions of overtime availability, restrictions on extra mail transportation trips, testing of new mail sorting and delivery policies at hundreds of Post Offices, and the reduction of the number and use of processing equipment at mail processing plants. These changes compound the operational and service delays that you have instituted.

During our meeting with Leader Schumer on August 5, you committed to greater transparency and accountability with the Congress and the American people regarding the changes that you have made, which directly reach into the lives of the American people. We remind you of your pledge to provide documentation of the operational changes that you have and are currently making, and of the Postal Service's plan to successfully deliver election mail during the 2020 elections.

The Postal Service motto states, "Neither snow nor rain nor heat nor gloom of night stays these couriers from the swift completion of their appointed rounds." Let us keep the promise provided for in the Constitution to the American people.

We await your swift reply.

Sincerely,  
116th Congress



(//web.archive.org/web/20221221132113/https://twitter.com/share?

url=https://oversight.house.gov/news/press-releases/pelosi-maloney-joined-by-173-house-democrats-in-calling-on-postmaster-general-to&text=Pelosi, Maloney Joined by 173 House Democrats in Calling on Postmaster General to Reverse Assault on Postal Service https://oversight.house.gov/news/press-releases/pelosi-maloney-joined-by-173-house-democrats-in-calling-on-postmaster-general-to via @OversightDems)



## 39 U.S.C. § 3692

### Section 3692 - Performance targets and transparency

(a) PERFORMANCE TARGETS.-Each year, to ensure that mail service for postal customers meets the service standards for market-dominant products, established under section 3691, the [Postal Service](#) shall-

(1) not later than 60 days after the beginning of the fiscal year in which they will apply, establish and provide to the Postal Regulatory Commission reasonable targets for performance for each [product](#); and

(2) provide the previous fiscal year's performance targets in its Annual Compliance Report to the Postal Regulatory Commission for evaluation of compliance for each [product](#).

(b) POSTAL REGULATORY COMMISSION DETERMINATION OF CERTAIN PERFORMANCE INFORMATION.-Not later than 90 days after first receiving the performance targets under subsection (a)(1), the Postal Regulatory Commission shall provide to the [Postal Service](#)-

(1) requirements for the [Postal Service](#) to publish nationwide, regional, and local delivery area performance information in accordance with subsection (c)(2) that-

(A) are consistent with the organizational structure of the delivery network of the [Postal Service](#) (including at the District and Area organizational levels, or the functional equivalents, and, to the extent practicable, at the U.S. ZIP Code Area level);

(B) reflect the most granular geographic level of performance information appropriate for the [Postal Service](#) to publish; and

(C) includes time period segments for the published geographic levels to satisfy the publishing requirements of subparagraphs (A) and (C) of subsection (c)(2); and

(2) recommendations for any modifications to the [Postal Service](#)'s measurement systems necessary to measure and publish the performance information under subsection (c)(2) that the Postal Regulatory Commission deems relevant.

(c) PUBLIC PERFORMANCE DASHBOARD.-

(1) IN GENERAL.-The [Postal Service](#) shall develop and maintain a publicly available Website with an interactive web-tool that provides performance information for market-dominant products that is updated on a weekly basis.

(2) PERFORMANCE INFORMATION.-The performance information provided for a market-dominant [product](#) on the Website shall include-

(A) the type of market-dominant [product](#);

(B) performance information for different geographic areas, consistent with subsection (b);

(C) performance information for different time periods, including annual, quarterly, monthly, and weekly segments;

(D) comparisons of performance information for market-dominant products to performance information for previous time periods to facilitate identification of performance trends; and

(E) the performance targets then in effect, and the performance targets for the previous fiscal year, as established under subsection (a)(1).

(3) COMPREHENSIBILITY.-The Website shall include plain language descriptions of the elements required under paragraph (2) and information on the collection process, measurement methodology, completeness, accuracy, and validity of the performance information provided on the Website.

(4) ADDRESS SEARCH FUNCTIONALITY.-The Website shall include functionality to enable a user to search for performance information by street address, ZIP Code, or post office box.

(5) FORMAT.-The [Postal Service](#) shall make the performance information provided on the Website available-

(A) in a manner that-

(i) presents the information required under paragraph (2) on an interactive dashboard;

(ii) is searchable and may be sorted and filtered by the elements described in paragraph (2); and

(iii) to the extent practicable, enables any person or entity to download in bulk-

(I) such performance information; and

(II) the results of a search by the elements described in paragraph (2);

(B) under an "open license" which has the meaning given that term in section 3502 of title 44; and

(C) as an "open Government data asset" and in a "machine-readable" format which have the meaning given those terms in section 3502 of title 44.

(6) CONSULTATION.-The [Postal Service](#) shall regularly consult with the Postal Regulatory Commission on appropriate features and information to be included on the Website.

(7) PUBLIC INPUT.-The [Postal Service](#) shall-

(A) solicit public input on the design and implementation of the Website; and

(B) maintain a public feedback tool to ensure each feature of, and the information on, the Website is usable and understandable.

(8) DEADLINE.-The Postal Service shall implement and make available to the public (and make any subsequent changes in accordance with subsection (b)) the Website not later than 60 days from the date on which the Postal Service receives the requirements and recommendations from the Postal Regulatory Commission under subsection (b), and shall continuously update such information on the Website as required by subsection (b).

(9) AVAILABILITY.-A link and plain language description of the Website shall be made available on any webpage where performance targets and measurements established under subsection (a)(1) are made available to the public.

(10) REPORTING.-The Postal Service, the Postmaster General, or the Board, as applicable, shall reference the dashboard described in paragraph (5)(A)(i) in the Annual Performance Plan under section 2803, the Annual Performance Report under section 2804, and the Annual Report under section 2402.

(11) DEFINITIONS.-In this subsection-

(A) PERFORMANCE INFORMATION.-The term "performance information" means the objective external performance measurements established under section 3691(b)(1) (D).

(B) WEBSITE.-The term "Website" means the website described in paragraph (1).

*39 U.S.C. § 3692*

Added Pub. L. 117-108, title II, §201(a), Apr. 6, 2022, 136 Stat. 1144.

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Office of Inspector General | United States Postal Service

## Audit Report

# Accenture Information Technology Contracts

Report Number 20-076-R21 | December 29, 2020



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# Highlights

## Objective

Our objective was to assess contractual compliance and oversight of the U.S. Postal Service's Accenture information technology (IT) contracts for fiscal years (FY) 2018-2019.

The Postal Service contracts with a variety of suppliers for goods and services such as technical and consulting services. Accenture Federal Services (Accenture) accounted for the highest amount of funds the Postal Service spent for IT contracts during FYs 2018 and 2019 – about \$332 million.

In 2009, the Accenture Enterprise Technology Services (ETS) contract was established to increase the number of staff to support IT operations nationwide and develop and maintain applications. This Indefinite Delivery Indefinite Quantity (IDIQ) contract continues to this day and allows the Postal Service to request services and supplies when needed but when the timing or amount required is not certain. The Postal Service is currently recompeting this contract and the future contract is estimated to be awarded in January 2021. The Supply Management group is responsible for oversight and administration of the current and future IDIQ contracts. With the Postal Service operating with significant net losses, effective management and oversight of contracts is critical.

We reviewed the Accenture ETS base contract and seven of 58 task orders that totaled \$165 million (or 50 percent) of contract costs for FYs 2018 and 2019. We judgmentally selected ten of 42 Accenture applications that were developed and maintained under these seven task orders.

## Findings

The Postal Service did not effectively manage the Accenture ETS contract or adhere to its internal controls for contractual compliance and oversight. Specifically, we found issues related to managing the cost of the contract, missing contract clauses, and an incomplete Quality Assurance Plan.

We found the Supply Management group did not develop and maintain a cost management plan and evaluate cost variances to ensure the contract remained within budget. In addition, the competition advocate advised Supply Management

to recompet the contract to create an opportunity for increased competition. However, the Postal Service continued to rely heavily on Accenture's services and raised the contract ceiling price from \$750 million to \$1.95 billion without evaluating competitive pricing for these services.

These issues occurred because the Supply Management group did not enforce the internal controls outlined in the policy to develop a cost management plan and evaluate cost variances. Also, management made a business decision to continue with Accenture services to avoid program delays and transition time to recompet the contract. The Cost Management Plan supports the effective management of contract costs and evaluation of competitive pricing ensures the Postal Service receives the best value for services procured under the contract. Further, the Postal Service is at risk of becoming overly dependent on a specific vendor for its IT services.

We also found that the Supply Management group did not include the appropriate contract clauses in the Accenture ETS contract. Specifically, they did not include the required clauses for Reimbursement for Testing and Warranty Exclusion and Limitation of Damages. Additionally, management included clauses for Inspection and Acceptance and Quality Management System in the contract; however, policy states that these two clauses cannot be added to the same contract.

This occurred because management did not provide appropriate oversight to ensure the required clauses were included in the contract. According to the contracting officer (CO), the clauses were not reviewed because it was assumed the prior CO and legal team vetted the clauses before awarding the contract. On average, the Postal Service spent \$82.9 million annually in FYs 2018 and 2019

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***“The Postal Service continued to rely heavily on Accenture's services and raised the contract ceiling price from \$750 million to \$1.95 billion without evaluating competitive pricing for these services.”***

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for the seven Accenture ETS task orders reviewed. Without these clauses, the Postal Service could potentially face financial impact from loss of reimbursement from testing, warranty claims, or damages not explicitly stated in the contract.

Finally, the CO and IT organization did not establish the Quality Assurance team for this contract and did not fully complete and execute the Quality Assurance Plan. For example, the plan did not include milestone dates for the quality assurance reviews, but instead listed the dates as “to be determined.” This occurred because the CO and IT organization did not provide appropriate oversight of the quality assurance requirements. The Quality Assurance Plan supports the monitoring of quality controls throughout the project lifecycle and provides visibility into the health of the contract.

## Recommendations

We recommended management:

- Develop and implement a cost management plan during purchase planning for the future contract to effectively manage and monitor contract costs.
- Update the Supplying Principles and Practices to require an evaluation of the cost management plan as part of the noncompetitive purchase request process before approving contract ceiling price increases and to require contracting officers complete training on the policy requirements for the cost management plan.
- Modify the contract to include the required clauses in the Accenture Enterprise Technology Services contract and ensure the future contract terms conform to the guidelines in the Supplying Principles and Practices.
- Implement an oversight process to periodically verify the inclusion of required contract clauses throughout the life of the contract.
- Complete and implement a Quality Assurance Plan to effectively monitor quality objectives for the future contract.



# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

December 29, 2020

**MEMORANDUM FOR:** MARK A. GUILFOIL  
VICE PRESIDENT, SUPPLY MANAGEMENT  
  
MARC D. MCCRERY  
VICE PRESIDENT, TECHNOLOGY APPLICATIONS

*Margaret B. McDavid*

**FROM:** Margaret B. McDavid  
Deputy Assistant Inspector General  
for Information Technology and Inspection Service

**SUBJECT:** Audit Report – Accenture Information Technology Contracts  
(Report Number 20-076-R21)

This report presents the results of our audit of the Accenture Information Technology Contracts.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Mary Lloyd, Director, Information Technology, or me at 703-248-2100.

Attachment

cc: Postmaster General  
Corporate Audit Response Management

# Results

## Introduction/Objective

This report presents the results of our self-initiated audit of the Accenture Information Technology (IT) Contracts (Project Number 20-076). Our objective was to assess contractual compliance and oversight of the U.S. Postal Service's Accenture information technology contracts for fiscal years (FY) 2018-2019.

See [Appendix A](#) for additional information about this audit.

## Background

The Postal Service contracts with a variety of suppliers for goods and services such as technical and consulting services. Accenture Federal Services (Accenture) accounted for the highest amount of funds the Postal Service spent for IT contracts during FYs 2018 and 2019 – about \$332 million. In 2009, the Accenture Enterprise Technology Services (ETS) contract was established to increase the number of staff to support IT operations nationwide and develop and maintain applications. This Indefinite Delivery Indefinite Quantity (IDIQ)<sup>1</sup> contract continues to this day and allows the Postal Service to request services and supplies when needed but when the timing or amount required is not certain. These requests are made using task orders (e.g., Time-and-Materials (T&M)<sup>2</sup> contracts) which are issued to the supplier for services under an existing IDIQ contract. The Postal Service is currently recompeting this contract and the future contract is estimated to be awarded in January 2021. The Supply Management group is responsible for oversight and administration of the current and future IDIQ contracts. With the Postal Service operating with significant net losses, effective management and oversight of contracts is critical.

During FY 2019, we published three audit reports<sup>3</sup> that highlighted multiple issues with [REDACTED] developed and maintained by Accenture. Based on the deficiencies identified in FY 2019 audit reports related to Accenture, we determined that a review of Accenture IT contracts was warranted.

To accomplish our objective, we reviewed the Accenture ETS base contract and seven of 58 task orders that totaled \$165 million (or 50 percent) of contract costs for FYs 2018 and 2019. We also judgmentally selected ten of 42 Accenture applications developed and maintained under these seven task orders.

We found the Postal Service did not effectively manage the Accenture ETS contract or adhere to internal controls for contractual compliance and oversight. Specifically, we found issues related to managing the cost of the contract, missing contract clauses, and an incomplete Quality Assurance Plan (QAP).

## Finding #1: Cost Management

The Postal Service did not adhere to its internal controls to effectively manage the cost of the Accenture ETS contract. Specifically, we found the Supply Management group did not develop and maintain a cost management plan.<sup>4</sup> They also did not evaluate cost variances to ensure the contract remained within budget. Postal Service policy<sup>5</sup> requires the pricing analyst<sup>6</sup> to develop the cost management plan and the contracting officer (CO) to review it. Policy also

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***“The Postal Service did not adhere to its internal controls to effectively manage the cost of the Accenture ETS contract.”***

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<sup>1</sup> Type of contract that provides for an indefinite quantity of supplies or services during a fixed period of time.

<sup>2</sup> T&M contracts are orders placed against an indefinite-delivery contract. The Postal Service and supplier agree on a fixed hourly rate for each labor category required. Each required labor rate is inclusive of the supplier's applicable cost elements such as direct labor, labor overhead, general and administrative expenses, and profit.

<sup>3</sup> The three audits we published [REDACTED] Management Alert – [REDACTED] (Report Number IT-MT-19-002, dated August 26, 2019), and *Review of Postal Service's Response* [REDACTED] (Report Number IT-AR-19-005, dated September 6, 2019).

<sup>4</sup> The cost management plan is developed using the purchase plan, which provides the overall strategy to accomplish and manage a purchase.

<sup>5</sup> *Supplying Principles and Practices* (SP&P) Section 5-1, Develop, Finalize, and Implement Cost Management Plan and Section 5-1.1, Develop a Cost Management Plan, dated October 2019.

<sup>6</sup> Pricing analyst is responsible for determining the most appropriate technique for a given purchase. However, the Postal Service does not have a pricing analyst for the Accenture ETS contract.

requires the CO to analyze cost variances before making decisions regarding contract administration.

The Supply Management group and the IT organization did not recompute the contract over the 11-year period,<sup>7</sup> even though the competition advocate<sup>8</sup> advised them to recompute it to create an opportunity for increased competition. The Postal Service continued to rely heavily on Accenture's services and raised the contract ceiling price<sup>9</sup> for three of the four option year periods<sup>10</sup> without evaluating competitive pricing<sup>11</sup> for these services. For example, the Postal Service originally awarded the contract competitively for a maximum value of \$750 million.<sup>12</sup> However, they approved noncompetitive purchase requests (NPR)<sup>13</sup> that more than doubled the contract value to \$1.95 billion (see Figure 1). Postal Service policy<sup>14</sup> states that a purchase plan<sup>15</sup> for a noncompetitive purchase should provide a clear understanding of the best value sought and business processes that will be used to obtain that value. Policy also states that in most cases, the competitive purchase method is best suited to meet the business objectives of the Postal Service.

These issues occurred because the Supply Management group did not enforce the internal controls outlined in the policy to develop a cost management plan and evaluate cost variances. Specifically, they stated developing a cost management plan was not standard practice for this type of contract. There was also uncertainty among the Supply Management group, IT organization, and contracting officer representatives (COR)<sup>16</sup> about who was responsible for developing the cost management plan and evaluating cost variances for the Accenture ETS contract. Further, management made a business decision to continue with Accenture services to avoid program delays and transition time associated with recompeting the contract.

**Figure 1. Accenture ETS Contract Ceiling Price Increases (millions)**

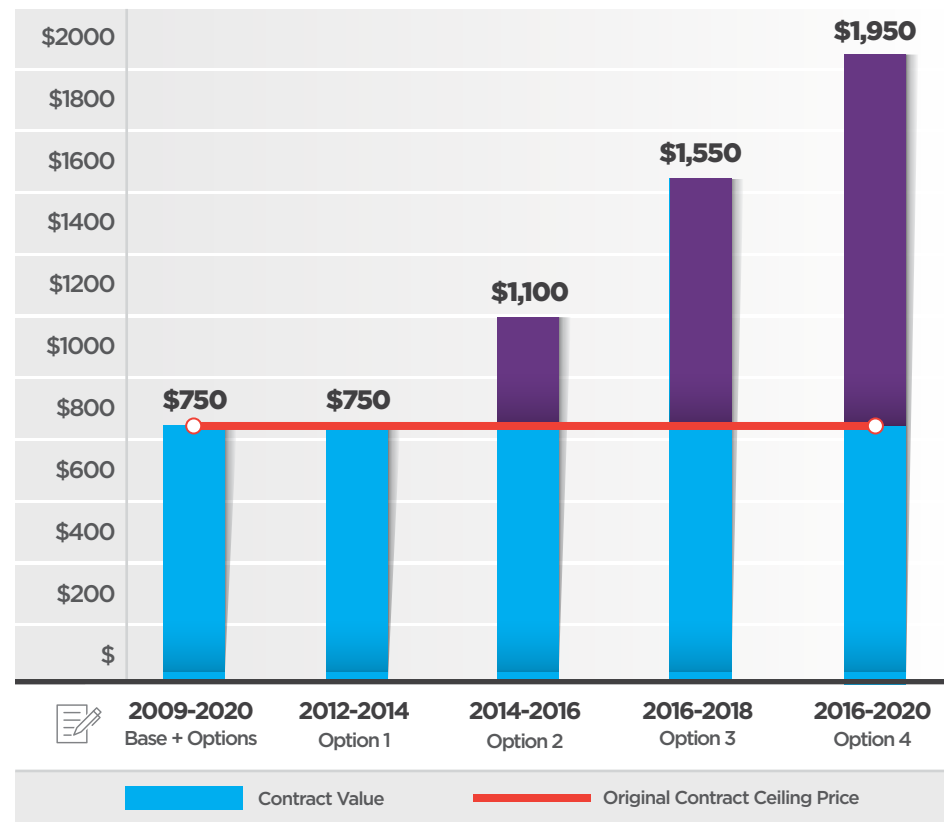


Figure reflects the Accenture ETS contract ceiling price increases for the period of performance from 2009 to 2020.

Source: Contract Authoring and Management System, Accenture ETS contract file, as of January 2020.

<sup>7</sup> The Postal Service awarded the Accenture ETS contract in 2009 covering a base contract period of three years with four two-year option periods.

<sup>8</sup> The competition advocate provides an independent review for the CO to consider in their evaluation of the noncompetitive purchase request.

<sup>9</sup> The ceiling price is the maximum aggregate amount that the Postal Service is obligated to pay the supplier for efforts expended under the contract or order.

<sup>10</sup> An option period authorizes the Postal Service to unilaterally elect to purchase the additional quantities of goods or services in the contract option.

<sup>11</sup> Competition brings market forces to bear and allows comparison of the relative value of competing proposals and prices.

<sup>12</sup> IDIQ contracts have guaranteed minimum and maximum order amounts for the Accenture ETS base contract and the maximum was \$750 million.

<sup>13</sup> When the Postal Service recommends purchases should be made noncompetitively, the requesting organization must submit a NPR to the contracting officer.

<sup>14</sup> SP&P Section 2-1.3.2, Noncompetitive Purchases, dated October 2019; and Management Instruction SP S2-2015-1, *Noncompetitive Purchases*, dated August 2015.

<sup>15</sup> SP&P Section 2-1.1, Develop a Purchase Plan, dated October 2019. A purchase plan provides the overall strategy to accomplish and manage a purchase.

<sup>16</sup> COs have delegated contract authority and may designate Postal Service employees to serve as CORs. These individuals are authorized to take actions related to the award and administration of specified contracts.

The Cost Management Plan supports the effective management of contract costs and evaluation of competitive pricing ensures the Postal Service receives the best value for services procured under the contract. Without recompeting contracts, the Postal Service is at risk of becoming overly dependent on a specific vendor for its IT services.

### Recommendation #1

We recommend the **Vice President, Supply Management and Vice President, Technology Applications**, develop and implement a cost management plan during purchase planning for the future contract to effectively manage and monitor contract costs.

### Recommendation #2

We recommend the **Vice President, Supply Management**, update the Supplying Principles and Practices to require an evaluation of the cost management plan as part of the noncompetitive purchase request process before approving contract ceiling price increases and to require contracting officers complete training on the policy requirements for the cost management plan.

## Finding #2: Contract Clause Compliance

We found that the Supply Management group did not include the appropriate contract clauses in the Accenture ETS contract and ensure compliance with contracting policy. While the Postal Service included 60 of the applicable clauses in the contract, they did not include Clause 2-23: Reimbursement – Postal Service Testing and Clause 4-15: Warranty Exclusion and Limitation of Damages. In addition, management did not comply with policy by including Clause 2-1: Inspection and Acceptance and Clause 2-2: Quality Management System in the Accenture ETS contract.

***“We found that the Supply Management group did not include the appropriate contract clauses in the Accenture ETS contract and ensure compliance with contracting policy.”***

Postal Service policy requires the following:

- Clause 2-23: Reimbursement – Postal Service Testing<sup>17</sup> must be added when Clause 2-1: Inspection and Acceptance or Clause 2-2: Quality Management System are included in the contract. This clause addresses the costs to the supplier for Postal Service time when the supplier is not compliant for an inspection requested by the supplier and for re-inspections.
- Clause 4-15: Warranty Exclusion and Limitation of Damages<sup>18</sup> must be included in all contracts for information systems and specifies there are no warranties expressed or implied, except as specifically stated in the contract.
- Clause 2-1: Inspection and Acceptance<sup>19</sup> and Clause 2-2: Quality Management System should not be included in the same contract. Both clauses are used to manage quality; however, Clause 2-2 should be included when the supply or service contracts are extensive, complex, or unique and the Postal Service requires that the supplier maintain a quality management system.

This occurred because management did not provide appropriate oversight to ensure the required clauses were included in the contract. According to the CO, the clauses were not reviewed because it was assumed the prior CO and legal team vetted the clauses before awarding the contract. Further, the Postal Service may not be exercising all of its rights under the contract and is at an increased risk of not completely protecting its financial interest. For the seven Accenture ETS task orders evaluated during our audit period, the Postal Service incurred contract costs exceeding \$165 million.<sup>20</sup> Without these clauses, the Postal Service could potentially face financial impact from loss of reimbursement from testing, warranty claims, or damages not explicitly stated in the contract.

17 SP&Ps, Section 5-6.1, Develop a QAP; and Section 4-4.5, Surveillance or Audit of the Work In Progress, dated October 2019.

18 SP&Ps, Section 8-4.10, Clauses; and Section 10, Contract Clauses, dated October 2019.

19 SP&Ps, Section 5-6.1, Develop a QAP, dated October 2019.

20 Unsupported Questioned Costs – A subset of questioned costs that are called into question because of missing or incomplete documentation, or because of failure to follow required procedures.



**Recommendation #3**

We recommend the **Vice President, Supply Management**, modify the contract to include the required clauses in the Accenture Enterprise Technology Services contract and ensure the future contract terms conform to the guidelines in the Supplying Principles and Practices.

**Recommendation #4**

We recommend the **Vice President, Supply Management**, implement an oversight process to periodically verify the inclusion of required contract clauses throughout the life of the contract.

**Finding #3: Quality Assurance**

The CO and IT organization did not establish a Quality Assurance team<sup>21</sup> and did not fully complete and execute the QAP. For example, the QAP did not include milestone dates for the quality assurance reviews, but instead listed the dates as “to be determined.” While the CO maintains performance metrics for Accenture, those metrics do not address quality controls as defined in the QAP. Policy<sup>22</sup> states the QA team should draft the QAP. Also, policy states the client,<sup>23</sup> Accenture, and the Supply Management group have joint responsibility with the QA team for executing the QAP. The QAP was not established or executed because the CO and IT organization did not provide appropriate oversight of the quality assurance requirements. The QAP supports the monitoring of quality controls throughout the project lifecycle and provides visibility into the health of the contract.

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*“While the CO maintains performance metrics for Accenture, those metrics do not address quality controls as defined in the QAP.”*

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**Recommendation #5**

We recommend the **Vice President, Supply Management and Vice President, Technology Applications**, complete and implement a quality assurance plan to effectively monitor quality objectives for the future contract.

**Other Matters: Risks Associated with Information Technology Applications**

While conducting this audit, we found the Postal Service allowed IT applications to operate in the production environment with substantial vulnerabilities. Although the issues identified were not directly related to the scope of the audit, they were security weaknesses that warranted management’s attention and corrective action. Therefore, we issued the *Risks Associated with Information Technology Applications* alert (Report Number 20-251-R20, dated July 27, 2020). The Postal Service agreed with our recommendations to complete the Certification and Accreditation (C&A) process for all identified applications. The Postal Service addressed all recommendations and we closed them on September 14, 2020.

**Management’s Comments**

Management generally agreed with the findings and recommendations in the report. Management believes that additional information in the report’s findings would provide clarifying context regarding administration of the Accenture ETS contract. Management acknowledges that the contract ceiling price increased during the option periods; however, as technology applications and information technology requirements dramatically increased during the period of performance, this estimate proved to be insufficient. Management also stated that they competitively awarded the Accenture contract under the ETS Program. The purchase strategy envisioned the supplier’s continued performance and there was not a plan to otherwise recompute the contract during the 11-year period. Additionally, management disagreed with the monetary impact because they believe the missing contract clauses do not restrict the Postal Service

<sup>21</sup> The QA team is often made up of members of the purchase and Supply Chain Management team and reports to both the client and CO.

<sup>22</sup> SP&P Section 5-6.2, Execute the QAP, dated October 2019.

<sup>23</sup> The client for the Accenture ETS contract is the Postal Service’s Information Technology organization.

from making a request for equitable adjustment against the supplier for any performance issues.

Regarding recommendation 1, management agreed with this recommendation and stated they will review the use of a cost management plan during the purchase planning phase for the future contract. The target implementation date is June 2021.

Regarding recommendation 2, management agreed with this recommendation in part. Specifically, management agreed to update the SP&P regarding cost management plans and train contracting officers on revised policy requirements. However, they will not require an evaluation of the cost management plan as part of the NPR process before approving contract ceiling price increases, stating that a cost management plan is not applicable to every noncompetitive contract. The target implementation date is December 2021.

Regarding recommendation 3, management agreed with this recommendation and stated they will attempt to negotiate and modify the existing contract to include the omitted clauses. They will also ensure that future contract terms conform to SP&P guidelines. The target implementation date is November 2021.

Regarding recommendation 4, management agreed with this recommendation and stated they will implement an oversight process to periodically verify the inclusion of required contract clauses throughout the life of the contract. The target implementation date is March 2021.

Regarding recommendation 5, management agreed with this recommendation to complete and implement a quality assurance plan to effectively monitor quality objectives for the future contract. The target implementation date is November 2021.

See [Appendix B](#) for management's comments in their entirety.

## Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations in the report.

The OIG considers the monetary impact assessed to be appropriate and related to unsupported questioned costs because the Postal Service acknowledged that the required clauses were missing from the contract. We chose a conservative amount of \$165 million covering our audit period of two years; however, the clauses were missing during the entire 11-year period. These unsupported questioned costs quantify the impact of missing clauses which could potentially lead to the Postal Service not fully exercising all of its rights under the contract.

In response to management's comments on our findings, as stated, the Postal Service did not recompet the Accenture ETS contract over the 11-year period, which limited its ability to increase competition and obtain the best pricing for the ETS contract. Although the Postal Service followed the NPR process in raising the contract ceiling price, the cost management plan documented in policy would assist in providing a critical control to support ceiling price increases.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

# Appendices

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# Appendix A: Additional Information

## Scope and Methodology

The scope of our audit included a review of the Postal Service's Accenture IT contracts. We reviewed the Accenture ETS base contract and seven of 58 task orders that totaled \$165 million (or 50 percent) of the contract costs for FYs 2018 and 2019. We judgmentally selected ten of 42 Accenture applications that were developed and maintained under these seven task orders. We compared the IDIQ Accenture ETS base contract to the Postal Service Supplying Principles and Practices to determine if the contract complied with policy. We reviewed policies and procedures to gain an understanding of the Postal Service's internal controls to comply with the C&A process for the Accenture developed and maintained applications. Also, we reviewed the applications based on a testing issue found in a prior audit report,<sup>24</sup> which lead to the *Risk Associated with Information Technology Applications* management alert (Report Number 20-251-R20, dated July 27, 2020).

To accomplish our objective, we:

- Obtained background information related to Accenture, including the history of Accenture, the scope of Accenture's involvement with the Postal Service, and other pertinent information.
- Identified the universe of contracts, systems and services related to Accenture for FYs 2018 - 2019.
- Reviewed policies and procedures to gain an understanding of the Postal Service's internal controls to manage contract cost, monitor quality assurance, and comply with the C&A process for systems developed and maintained by Accenture.

- Interviewed the CO, CORs, program managers, and other appropriate officials to understand their process for providing oversight and management of the contract and task orders.
- Reviewed Accenture ETS contracts and statements of work to document key contract deliverables and determine if all the required contract clauses were included.
- Evaluated the adequacy of contract oversight to include cost management practices and work performed under the contract to ensure compliance with policy.
- Evaluated the C&A process for the ten applications sampled to determine compliance with Postal Service policy.

We conducted this performance audit from November 2019 through December 2020 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on November 20, 2020 and included their comments where appropriate.

We assessed the reliability of contracting data by interviewing the CO and comparing datasets from the Enterprise Data Warehouse. We determined that the data were sufficiently reliable for the purposes of this report.

<sup>24</sup> Review of Postal Service's Response [REDACTED] (Report Number IT-AR-19-005, dated September 6, 2019).



## Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact (in millions)
<i>Risks Associated with Information Technology Applications</i>	Provide U.S. Postal Service officials immediate notification of the issues identified during our ongoing audit.	20-251- R20	7/27/2020	None
<i>Review of Postal Service's Response</i> [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	IT-AR-19-005	9/6/2019	None
[REDACTED] (Management Alert)	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	IT-MT-19-002	8/26/2019	None
[REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	None
<i>U.S. Postal Service Contract Labor Substitution</i>	Determine whether contracting officers complied with Postal Service policy for labor substitution on [REDACTED] contracts.	SM-AR-17-005	5/30/2017	\$150
<i>Controls Over Multiple Award Indefinite Delivery, Indefinite Quantity Contracts</i>	Assess the Postal Service's use of multiple award IDIQ contracts. Specifically, to determine whether there are adequate controls over the use of this contract vehicle and identify best practices for the use of IDIQ contracts.	SM-AR-16-007	3/28/2016	\$722

# Appendix B: Management's Comments



December 17, 2020

JOSEPH E. WOLSKI  
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Draft Audit Report – Accenture Information Technology  
Contracts (Project Number 20-076-DRAFT)

Thank you for providing the United States Postal Service (Postal Service) with an opportunity to review and comment on the subject draft audit report titled "Accenture Information Technology Contracts" dated November 24, 2020. Management views that additional information within the report's findings would provide clarifying context to the audit results. Management agrees in general with the report's recommendations. Management does not agree with the monetary impact.

## Findings

Regarding the report's findings, Management views that additional information is necessary and would provide clarifying context to more properly reflect the circumstances with respect to the administration of the Accenture Enterprise Technology Services (ETS) contract.

Concerning Finding #1 Cost Management, the OIG notes that the Postal Service did not recompetite the contract over the 11-year period of performance and suggests there is a lack of competition concerning Accenture's performance. As background, the Accenture contract was awarded with a three-year base period of performance and four 2-year option terms. Subject to satisfactory performance of the supplier, the purchase strategy for the instrument envisioned the supplier's continued performance and there was not a plan to otherwise recompetite the contract within the contract term. Additionally, the Enterprise Technology Services (ETS) program, under which the Accenture contract was awarded, is a competitively awarded multiple award program. The ETS program provides for several sources in addition to Accenture which the Postal Service uses to provide technology solutions for our operations. Each supplier performs under individual IDIQ instruments. Accordingly, competition is an ongoing component of ETS. The Contracting Officer (CO) evaluates competitive pricing between contract holders in negotiating and determining task order awards.

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- 2 -

Management acknowledges that the ceiling price of the contract was raised through the option periods, however the OIG states that it was done without evaluating competitive prices. As noted above, the CO evaluates competitive pricing already under contract with the other ETS suppliers in the program when evaluating competitive task orders, and used this same approach in determining price reasonableness concerning the negotiation and exercise of options contained in the contract. The initial ceiling price was an estimate of the amount of work to be performed by the supplier, however as technology applications and information technology requirements dramatically increased within the Postal Service during the period of performance, this estimate proved to be insufficient. The CO properly processed the Noncompetitive Purchase Request (NPR) documentation in raising the contract ceiling.

Concerning Finding #2 Contract Clause Compliance, the OIG found that Supply Management did not include two required contract clauses in the Accenture ETS contract, Clause 2-23: Reimbursement – Postal Service Testing, and Clause 4-15: Warranty Exclusion and Limitation of Damages. Additionally, the OIG found that the CO in awarding the contract in 2009 included both Clause 2-1: Inspection and Acceptance, and Clause 2-2: Quality Management System in the Accenture ETS contract. While policy recommends that both clauses 2-1 and 2-2 are not to be used in the same contract, the obligation on the supplier to provide for a Quality Management System enhanced the performance of the supplier and did not result in any demonstrated harm to the Postal Service.

In its report, the OIG expressed a concern that without Clause 2-23 the Postal Service "may not be exercising all of its rights under the contract and is at an increased risk of not completely protecting its financial interest." The lack of Clause 2-23 in no way restricts the Postal Service from asserting a request for equitable adjustment against the supplier for any failure of performance including its failure to support a scheduled test. Additionally, the OIG did not identify any instance during the past decade in which the Postal Service was unable to fully exercise its service inspection rights due to any clause omissions. Clause 4-15 is a clause which benefits the supplier concerning claims of warranty, the omission of which has no effect on the Postal Service.

In summary, the OIG did not find that the omission of any clause resulted in any unrecovered costs or improperly paid amounts spent by Postal Service. Accordingly, it is difficult to reach the conclusion that the omissions had any material adverse impact on the Postal Service.

- 3 -

**Monetary Impact**

As noted above, the OIG audit did not find any circumstance where either the inclusion of an extra clause, or lack of including Clause 2-23 and Clause 4-15 damaged the Postal Service. The OIG however calculates the entire value of the subject seven task orders as unsupported questioned costs. Management suggests that denoting such a significant sum without any circumstance of actual impact due to the clauses in question or failure of the supplier to perform is not an accurate reflection of contract administration concerning the Accenture ETS contract. The clauses cited in the in the draft audit report while addressed in policy, are not required by regulation or law.

Under the seven task orders reviewed, Accenture delivered the required performance and the Postal Service paid Accenture for that performance at the agreed-upon rates. The inclusion, or failure to include, the clauses discussed in Finding #2 had no impact on the performance or payment of those task orders.

**OIG Recommendations**

We recommend the Vice President, Supply Management and the Vice President, Technology Applications:

**Recommendation 1:**

We recommend the Vice President, Supply Management and Vice President, Technology Applications, develop and implement a cost management plan during purchase planning for the future contract to effectively manage and monitor contract costs.

**Management Response/Action Plan:**

Management agrees with this recommendation. We will review the use of a cost management plan during the purchase planning phase for the future contract.

**Target Implementation Date:**

June 2021

**Responsible Official:**

Manager, Technology Infrastructure Portfolio, Supply Management  
Executive Director, Technology Applications



- 4 -

**Recommendation 2:**

We recommend the Vice President, Supply Management, update the Supplying Principles and Practices to require an evaluation of the cost management plan as part of the noncompetitive purchase request process before approving contract ceiling price increases and to require contracting officers complete training on the policy requirements for the cost management plan.

**Management Response/Action Plan:**

Management agrees in part with this recommendation. Management agrees to update the Supplying Principles and Practices regarding cost management plans, and train contracting officers on the revised policy requirements. However, we will not require an evaluation of the cost management plan as part of the noncompetitive purchase request process before approving contract ceiling price increases. A cost management plan is not applicable to every noncompetitive contract.

**Target Implementation Date:**

December 2021

**Responsible Official:**

Manager, Supply Management Infrastructure, Supply Management

**Recommendation 3:**

We recommend the Vice President, Supply Management, modify the contract to include the required clauses in the Accenture Enterprise Technology Services contract and ensure the future contract terms conform to the guidelines in the Supplying Principles and Practices.

**Management Response/Action Plan:**

Management agrees with this recommendation. We will attempt to negotiate and modify the existing contract to include the omitted clauses. We will ensure that the future contract terms conform to the guidelines in the Supply Principles and Practices.

**Target Implementation Date:**

November 2021

- 5 -

**Responsible Official:**

Manager, Technology Infrastructure Portfolio, Supply Management

**Recommendation 4:**

We recommend the Vice President, Supply Management, implement an oversight process to periodically verify the inclusion of required contract clauses throughout the life of the contract.

**Management Response/Action Plan:**

Management agrees with this recommendation. We will implement an oversight process to periodically verify the inclusion of required contract clauses throughout the life of the contract.

**Target Implementation Date:**

March 2021

**Responsible Official:**

Manager, Technology Infrastructure Portfolio, Supply Management

**Recommendation 5:**

We recommend the Vice President, Supply Management and Vice President, Technology Applications, complete and implement a quality assurance plan to effectively monitor quality objectives for the future contract.

**Management Response/Action Plan:**

Management agrees with this recommendation.

**Target Implementation Date:**

November 2021

- 6 -

**Responsible Official:**

Manager, Technology Infrastructure Portfolio, Supply Management  
Executive Director, Technology Applications

E-SIGNED by MARK GUILFOIL  
on 2020-12-17 15:50:59 CST

Mark A. Guilfoil  
Vice President,  
Supply Management

E-SIGNED by Marc D McCreery  
on 2020-12-17 16:07:34 CST

Marc D. McCreery  
Vice President  
Technology Applications

cc: Manager, Corporate Audit Response Management



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> Accenture confirms data breach after August ransomware attack

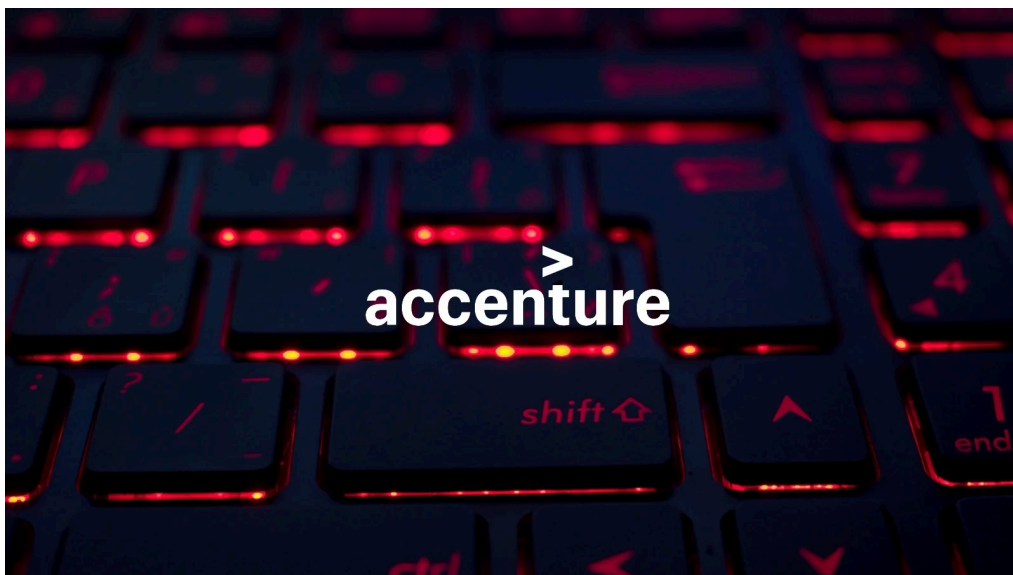
## Accenture confirms data breach after August ransomware attack

By  
**Sergiu Gatlan**  
(<https://www.bleepingcomputer.com/author/sergiu-gatlan/>)

October 15, 2021

10:49 AM

0



Global IT consultancy giant Accenture confirmed that LockBit ransomware operators stole data from its systems during an attack that hit the company's systems in August 2021.

This was revealed in the company's financial report for the fourth quarter and full fiscal year, which ended on August 31, 2021.

"In the past, we have experienced, and in the future, we may again experience, data security incidents resulting from unauthorized access to our and our service providers' systems and unauthorized acquisition of our data and our clients' data including: inadvertent disclosure, misconfiguration of systems, phishing ransomware or malware



attacks," Accenture said

(<http://www.documentcloud.org/documents/21085683-accenture-form-10-k-acn-bc-q4-2021#document/p28/a2060412>).

"During the fourth quarter of fiscal 2021, we identified irregular activity in one of our environments, which included the extraction of proprietary information by a third party, some of which was made available to the public by the third party.

"In addition, our clients have experienced, and may in the future experience, breaches of systems and cloud-based services enabled by or provided by us."

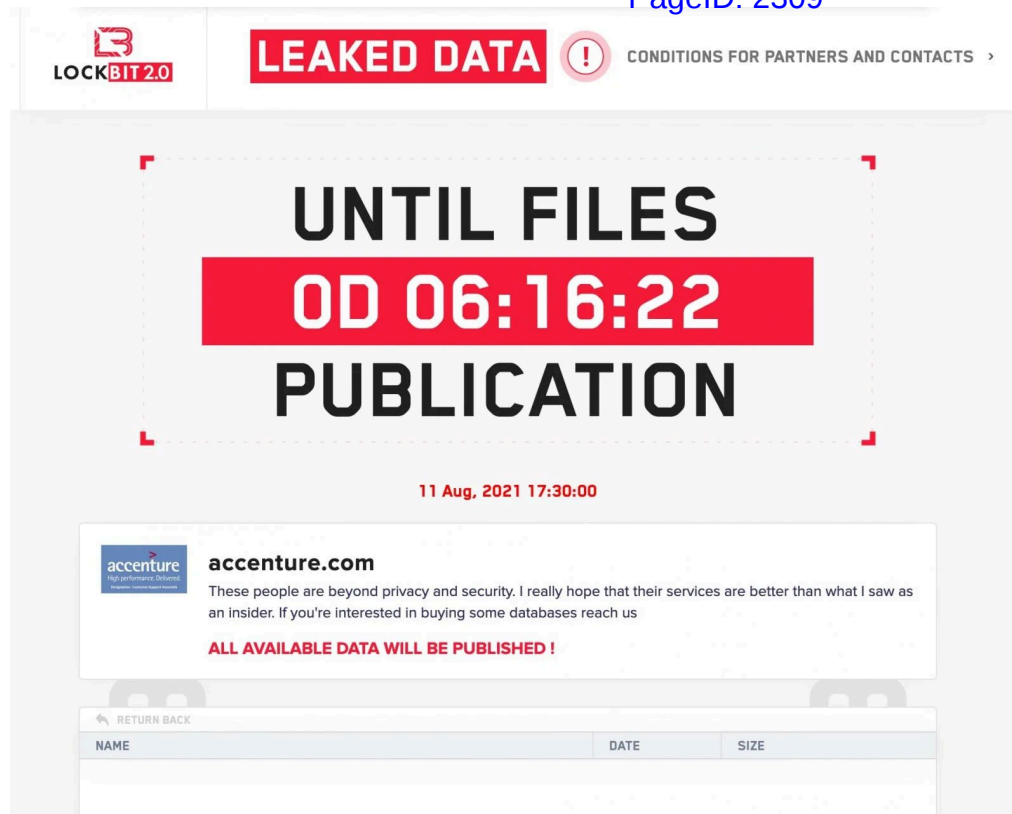
The LockBit ransomware gang claimed to have stolen six terabytes of data from Accenture's network and demanded a \$50 million ransom.

Sources familiar with the attack also told BleepingComputer that Accenture confirmed the ransomware attack to at least one cyber threat intelligence vendor.

Even though Accenture has now confirmed that the attackers stole information from its systems and leaked it online, the company has not yet publicly acknowledged the data breach outside SEC filings or filed data breach notification letters with relevant authorities.

This likely means that the stolen data didn't contain any personally identifiable information (PII) or protected health information (PHI) data which would've triggered regulatory notification requirements.





*LockBit data leak site (BleepingComputer)*

## Accenture denies claims of stolen customer credentials

The ransomware attack was widely covered (<https://www.bleepingcomputer.com/news/security/accenture-confirms-hack-after-lockbit-ransomware-data-leak-threats/>) at the time, with the IT giant telling BleepingComputer that all affected systems were fully restored from backups, with no impact on Accenture's operations or its clients' systems.

In September, the company denied claims made by the LockBit gang (<https://www.bleepingcomputer.com/news/security/lockbit-gang-leaks-bangkok-airways-data-hits-accenture-customers/>) that they also stole credentials belonging to Accenture customers that would enable them to compromise their networks.

Although the threat actors declined to name any victims in conversations with BleepingComputer, they said they had breached and encrypted the systems of an airport using Accenture software.

Their claims align with at least two attacks that led to encrypted systems on the networks of Bangkok Airways and Ethiopian, two airline companies.



Both incidents took place after LockBit compromised the systems of Accenture, allegedly with the help of an insider.

"We have completed a thorough forensic review of documents on the attacked Accenture systems. This [LockBit's] claim is false," Accenture told BleepingComputer, denying that customer credentials were stolen in the August ransomware attack.

"As we have stated, there was no impact on Accenture's operations, or on our client's systems. As soon as we detected the presence of this threat actor, we isolated the affected servers."

Accenture is a Fortune 500 company and one of the world's largest IT services and consulting firms with more than 624,000 employees across 120 countries, providing services to a wide array of industry sectors, including banks, government, technology, energy, telecoms, and more.

An Accenture spokesperson replied with the company's original statement when contacted by BleepingComputer earlier today for more details on the stolen and leaked proprietary information, adding that clients were "fully informed on relevant details about the incident."

## Related Articles:

Nissan confirms ransomware attack exposed data of 100,000 people  
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LockBit claims ransomware attack on Fulton County, Georgia  
(<https://www.bleepingcomputer.com/news/security/lockbit-claims-ransomware-attack-on-fulton-county-georgia/>)

Bank of America warns customers of data breach after vendor hack  
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## SERGIU GATLAN

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Sergiu is a news reporter who has covered the latest cybersecurity and technology developments for over a decade. Email or Twitter DMs for tips.

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# Accenture Says US Justice Dept Probing Its Services to Government

By [Reuters](#) | Oct. 12, 2023 |

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 REUTERS

FILE PHOTO: The logo of Irish services and consulting company Accenture is seen at an temporary office during the World Economic Forum 2022 (WEF) in the Alpine resort of Davos, Switzerland May 25, 2022. REUTERS/Arnd Wiegmann/File Photo

(Reuters) - Accenture said on Thursday U.S. Justice Department is investigating its unit on allegations that one or more employees gave inaccurate information over its compliance with federal security controls to the government.

The criminal and civil probes followed a voluntary disclosure by the unit, Accenture Federal Services, to the government, the IT service provider said in a regulatory filing.

"This matter could subject us to adverse consequences," Accenture said. The DOJ did not immediately respond to a request for comment.

►► **MORE:** [Places the U.S. Government Warns Not to Travel Right Now](#)

The unit works with the Accenture's clients in the U.S. federal government and accounted for 15% of overall fiscal 2023 revenue from North America, the company's biggest market.

"We cannot at this time determine when or how this matter will be resolved or estimate the cost or range of costs that are reasonably likely to be incurred in connection with this matter," the company said.



accenture



## Newsroom

[← Previous](#) [Next →](#)**JUNE 18, 2021**

### **Accenture Federal Services Wins \$112 million Task Order to Protect Federal Agencies from Cyber Breaches**

AFS to Deliver Turn-Key Solution to Increase Real-Time Visibility into Malicious Attacks

ARLINGTON, Va.; June 18, 2021 – [Accenture Federal Services](#) (AFS), a subsidiary of Accenture (NYSE: ACN), has been awarded a \$112 million prime task order by the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA) to protect Federal Civilian Executive Branch (FCEB) systems against cyberattacks.

AFS will provide advanced cyber services for CISA to help FCEB agencies mitigate the effects of cyberattacks including ransomware, botnets, and malware campaigns, while enhancing real-time visibility into cyber threats.

"Now, more than ever, it is crucial for our nation to move from a 'detect and respond' to a 'predict and prevent' model for dealing with cyberattacks. Our solution delivers a whole-of-government view of the threats we face as a nation," said AFS Managing Director and Cybersecurity Practice Lead, Aaron Faulkner. "Accenture Federal Services is excited to build upon our track record of delivering highly complex cyber solutions at scale."

As a team member on the CISA Task Order, Cloudflare will partner with AFS to help fortify federal government systems by blocking phishing and malware attacks before they happen and containing breaches that occur on devices, such as laptops and cell phones.

"Cyberattacks are becoming much more sophisticated. As a result of several recent newsworthy breaches, we are all now much more aware of the impact cyber threats can have on our daily lives," said Matthew Prince, co-founder & CEO of Cloudflare. "We're



Affidavit  
of  
Amanda Paige Elker

STATE OF NEW JERSEY  
COUNTY OF BURLINGTON

The undersigned Amanda Paige Elker declares under penalty of perjury under the laws of the State of New Jersey that the foregoing statement made are true and correct.

1. I, the Affiant, am over the age of 18 and am a resident of the State of NJ. I have personal knowledge of the facts herein, and, if called as a witness, could testify to the truth and accuracy thereto.
2. I am resident of New Jersey and participated as a voter in the 2020, 2021 and 2022 election process, having first-hand knowledge of said elections in my role with the Liberty Project, Inc.
3. I, the Affiant, suffer no legal disabilities and have personal knowledge of the facts set forth below.

4. I, the Affiant, affirms that:

This is my personal experience as a United States citizen and a member of The Liberty Project, Inc. My educational background includes two Bachelor of Arts degrees for both Psychology and Criminal Justice from Rutgers University, New Brunswick. I then completed a Master's in Social Work from the same university, earning my dual licensure in social work and drug/alcohol counseling. The licenses I hold are a Licensed Clinical Social Worker (LCSW) and Licensed Clinical Alcohol and Drug Counselor (LCADC) in the State of New Jersey.

During school I interned at drug rehabilitation treatment centers and after graduating I began working at them in every level of care. When the protocols for COVID were put in place I saw the difference it made at the inpatient drug rehabilitation agency I was working in at the time. Clients were made to quarantine the first days they were in treatment, which caused more clients to want to leave against medical advice (AMA) because of the isolation, being so early in recovery, and coming off of withdrawal from drugs/alcohol.

It scared many clients into leaving treatment when COVID first was introduced, as they were afraid to become ill as well. Luckily, as time passed there were no large outbreaks of people being ill which demonstrated that COVID may not be what was presented to the public at the time. Usually, in rehab settings colds are shared so easily with living at the facility, but this was not the case for COVID. I found it interesting that liquor stores were never closed during the time of COVID lockdowns, but other businesses were made to shut down.

Leaving the rehabilitation center and opening my own private practice, I have seen devastating effects to the mental health of people in this country. Three (3) years later, this is still having significant rebound effects. Increased numbers of younger people are struggling with suicide ideation, cutting/harming themselves, anxiety, depression, confusion about identity and who they are. I see this in all ages, but the lack of ability to cope through adversity in life is at an all time high. More and more people want the "easy fix" with prescribed medications and street drugs. For my teenage and college student clients, their grades suffered due to not being in the classroom and growing social anxiety from the isolation.

In terms of my family, they have been effected by their choice not to take the COVID bioweapon. My father, former US Marine and mother had to worry about the possibility of being fired for their own medical health decisions. My fiancé, former Army war veteran who fought overseas in Afghanistan, had to persuade being hired by a company, not by his merit and capabilities, but by justifying/explaining a medical decision that should be private and his own choice. In order to get the job he had to write a letter informing why he was making his own health choices. More and more veterans each year are homeless and find it difficult to assimilate back into civilian jobs, but where is the help for them?

Growing up in a patriotic household my whole life, I knew I had to be a part of the solution. I began researching, going down rabbit holes, seeing and reading things I cannot un-know. I found the leader, Mary Logan, President of The Liberty Project (under a different name at first) and was interviewed. Once accepted in the group, I was trained in various fashions from learning history of America and other parts of the world that was never taught in school, to how to create a FOIA for an OPRA request, protocols for retaining origination in chain of custody, and communicate with county officials to retrieve the necessary documents, to analyzing the received data to be apart of the DOCS team in writing a member summary based on evidence in fact and not conjecture.

Through obtaining public documentation regarding sovereign elections for the FOIA team (specifically the elections of 2020, 2021, and 2022) thus far, I have witnessed the absence of protections for chain of custody of such records, with many times receiving "no responsive records," for items requested demonstrating, again, a broken chain of custody. There have also been issues in seeking transparency in election and government records due to the cost imposed to retrieve the public documents (thousands of dollars) that The Liberty Project, as a self-funded organization, just simply cannot afford, this again is a clear deterrent to transparency in elections.

In viewing of the drop box tapes, it was apparent in retrieving these records that nobody seemed to have watched them before. For some counties responses of "The records do not exist," were a common theme. Other public records, such as the "cure lists" could not be obtained as well as chain of custody records for ballot tracking during the elections. In order to have sovereign elections, the methods by which the ballots are to be secure need to have standard protocol across all towns/cities, counties, and states. I learned during my time on the FOIA team that protocols are not uniform, even down to the names of documents that were to be used.

When I was working on analyzing the "visitor's logs" and "interior ballot chain of custody logs," I found in evidence that protocols for maintaining security of collection and transport for the ballots were not followed, another example of broken chain of custody. Elections cannot be promised to be "safe and secure" when the simplest of steps to maintain ballot chain of custody are ignored.

On a personal note regarding election integrity and other privileges of the United States, my fiance's grandmother received a mail-in-ballot for her deceased husband of 7 years at that time in 2020, in addition to her own ballot. If instances like this continue to happen, how can it be known what votes are legal or not. I was shocked to see when I went to the DMV to renew my driver's license in 2022 that a person could register to vote right there on the spot by clicking a button.

I personally have witnessed non-citizens of this country afforded privileges that American citizens do not have access to. For example, I have a client whose parents came into this country illegally and are still not legal citizens 20+ years after living in this country, yet she was granted scholarships for college; meanwhile I was not allowed to apply for many scholarships during my college career due to not being classified as a "minority." I am an advocate of helping others, including those in need, but I find it difficult to do so while looking in my own community and witnessing those in need who are no less deserving regardless if they are a minority or protected class.

Other impacts in The Liberty Project include people leaving the group due to getting caught up in other misleading avenues framed as election integrity or members exiting just simply from being too afraid of negative consequences from the government. The people should not be scared of being punished in order to obtain the facts in evidence when pursuing public information, following the law of the Constitution of the United States of America.

In conclusion, I thank you for taking the time to read this Affidavit. The one positive thing I can say regarding the above issues is that it has led me to develop a relationship with God and our lord and savior, Jesus Christ. It has helped opened my eyes wider to the truth and evidence in fact to help guide me in serving God and Country. I pray for this country to be able to restore us back to what God and the Founding Fathers intended it to be, a Constitutional Republic. In God We Trust.

5. I affirm that I am under no duress to sign this Affidavit, and I declare that, to the best of my knowledge and belief, the information herein is true and correct.

Executed this 8th day of JUNE, 2023.

Affiant Signature: A. P. Elker

75 WHITEBIRCH CT.  
Lumberton, NJ 08048

## NOTARY ACKNOWLEDGEMENT

State of

County of

The above names Affiant personally appears this day before the undersigned and upon duly being sworn, made oath that the facts stated herein are true and correct to the best of the Affiant's knowledge, information and belief.

Acknowledge before me this 21 day of December, 2023.

Notary Public Signature

MARY B. LOGAN

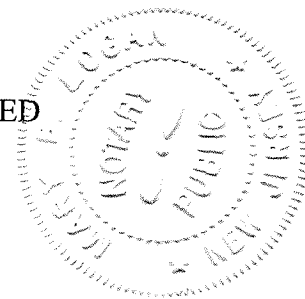
Notary Public, State of New Jersey

My Commission Expires

March 08, 2023

My Commission expires 3/8/28

SEAL AFFIXED



**Affidavit of Wanda Opdyke**

STATE OF New Jersey

COUNTY OF Somerset

The undersigned, Wanda Opdyke, declares under penalty of perjury under the laws of the State of New Jersey that the foregoing statements made are true and correct:

1. I am over the age of 18 and am a resident of the State of New Jersey. I have personal knowledge of the facts herein, and, if called as a witness, could testify to the truth and accuracy thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.
3. I affirm that:

After personally witnessing disturbing abnormalities during the 2020 General Election at which first confused, shocked, terrified, then angered and motivated me, I connected with hundreds of thousands of like-minded citizens across the United States. In late 2021 I joined a local organization here in New Jersey, The Liberty Project, Inc. (TLP). My first volunteer assignment was to lead TLP's Media and Communications team. Our goal was to contact every New Jersey State Assemblymen and Senator, share anomalous facts our Research team had uncovered within our election system, and garner their support for a full forensic audit.

As part of this role, I learned and subsequently taught other team members how to research the Legislators' records. We carefully reviewed the bills they sponsored/co-sponsored, their stance and actions in support of advancing them (or lack thereof), and sought to understand the "why" behind their bills. I had no idea what I was getting myself into, but I trusted and believed in the fact that our public servants who took an oath of office genuinely cared about their constituents and would enthusiastically want to hear from us. Shockingly, the overwhelming majority of legislators completely ignored us. They avoided our calls and emails, and/or deferred us to lower staff. A few actually acknowledged our election integrity cause, yet appallingly outright stated they had no interest or desire to meet. Every single one required multiple follow-up emails, phone calls, and/or posts to their social media pages to gain their attention. This was an astonishing learning lesson in civics. I never imagined that our local trusted elected leaders would collectively avoid discussing the electoral process. I could not help but wonder: Why are they so evasive? Why are they unwilling to meet and listen to We the People?

With constant persistence, our team ultimately secured meetings with thirty-two legislators across both parties by June 2022. The majority listened but in a condescending manner, politely dismissing our concerns. A handful were honest, yet flippant: One Democratic senior statesman openly admitted that "hanky panky" occurs around elections. Another fully agreed that voter rolls are poorly maintained. Yet another staunchly stood behind the permanent use of ballot drop boxes, originally intended as a covid-19 risk mitigation strategy, insisting they are necessary and fully secure. A highly seated Republican state senator personally witnessed fraudulent activity in a former position as County Clerk. Regardless of these admissions, not one single legislator took election integrity seriously and it became clear that the entire New Jersey Legislative branch had no interest in auditing what are supposed to be "free and fair elections". On a separate but related note, I work in the field of pharmaceutical clinical trials. It is not only commonplace, but mandated that pharma companies regularly audit their suppliers for quality assurance. Standard Operating Procedures, training, computer hardware systems, and data integrity are the most basic of requirements. I was stunned to learn that no one has ever audited our elections: the foundation of our American constitutional freedoms.

Our next goal was to meet with County officials (Boards of Elections, Clerks, and Commissioners) to build a relationship and obtain their support and partnership. Ten counties did not respond to our repeated meeting requests. We succeeded in delivering formal presentations with county-specific facts, graphs, and raw data supporting our anomalous findings to the remaining eleven. In general, they acted defensively, ignored, and/or dismissed us. Simultaneously, we issued hundreds of FOIA requests for data surrounding the 2016, 2018, 2020, 2021, and 2022 elections. This was the longest, most challenging and arduous task of all. Overwhelmingly, the counties completely ignored our OPRA requests, despite constant follow-up. Others filled them only partially and/or delayed response as long as possible. One county genuinely acknowledged election concerns, thanked us for our efforts, and appeared to want to partner with TLP to expose the truth. Knowing we are unpaid volunteers, that very same county later quoted tens of thousands of dollars to provide what are supposed to be "the People's Records". Other responses we ultimately received provided staggering evidence of extremely serious anomalies and a troubling lack of controls and transparency within our election processes, statewide. As example: we viewed thousands of hours of ballot drop box security footage and observed there to be no consistency across the counties and worse, a total lack of chain of custody. I learned through real facts, data, and direct observation that there is something deeply and profoundly wrong with our elections. There is no chain of custody, no security, no oversight, and an apparent desire by government officials to keep it that way. As such, I personally have no confidence in our governmental leaders.

On August 25, 2022 I accompanied several TLP members to the Mercer County Courthouse to formally file a Complaint to stay both the 2020 and 2021 election records in advance of the September 2, 2022 deadline. Two clerks carefully reviewed the documents. After



returning from the judge's chambers, the second clerk confirmed everything was in order and accepted the filing. From there, we proceeded to the State House to personally serve a copy to the New Jersey Secretary of State named in the Complaint. The office was moved due to construction, but a security officer kindly researched the new location and directed us to the 4<sup>th</sup> floor of 20 West State Street. The guard at that address made multiple attempts to reach several employees on the 4<sup>th</sup> floor; no one answered the phone. The guard remarked that in her experience it was quite unusual for no one to respond. Unable to deliver the document in person, we sent it via overnight courier the following week. Inexplicably, both UPS and FedEx were both unsuccessful in obtaining a delivery signature to the SoS office, despite the address having been confirmed to be correct. Meanwhile, upon follow up with the court, we learned that the original Complaint had been misplaced. It was later found, but rejected by the ombudsman on grounds of being incomplete unless filed by a board-certified attorney. It is important to reiterate the fact that the original was previously accepted as fully in order. To prevent us from missing the above critical deadline, the Complaint had to be filed *pro-se* instead of on behalf of The Liberty Project. All these highly atypical incidents led me to believe that the judicial system was blocking our every attempt to stay the election records.

In summary, I witnessed the same pattern of apathetic behavior within the Legislative, Local County, and Judicial branches of government: All refused to take proper action to ensure the security and chain of custody of our elections, and refused to work with the people to assure same.

Lastly, I would like to add a personal comment with regard to the topic of government overreach. As previously mentioned, I work in the pharmaceutical industry facilitating clinical trials. I knew from professional experience that mRNA is a new technology, never having been used in humans before, and that the covid-19 vaccine trials were not conducted within proper moral, ethical, and GCP standards. The rushed FDA review and approval process was questionable, at best. As such, I am vehemently opposed to mandated vaccinations. In the Spring of 2021, I urged my elderly mother not to take the covid vaccine due to her history of heart failure triggered by a childhood autoimmune disease. I have an adult son with an autoimmune brain disease and witnessed how inflammatory reactions (and in the case of mRNA, the spike protein) can irreversibly damage the human body. Much to my dismay, she was pressured by government, media, doctors, and peers to do so. Just days after her second shot, despite being on blood thinners for her heart condition, she suffered an apparent stroke. Since then she has exhibited a myriad of debilitating neurological problems for which there are no treatments or cures. There is not a single doubt in my mind nor hers that these new health problems are directly related to the mandated vaccine.

Based on my experiences and observations, I am gravely concerned that all levels of our government are no longer operating Of, By, or For the People. As such, our Freedom, Constitution, and Sovereignty are at risk, unless immediate action is taken to save it. That starts by passing election laws requiring **one day, one vote, voter ID, elimination of all ballot drop boxes, and independent election audit processes** guaranteeing quality assurance.

I affirm that I am under no duress to sign this affidavit, and I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed this 1st day of July, 2023. At this address 102 Omni Court, Neshanic Station, NJ 08853

AFFIANT SIGNATURE: \_\_\_\_\_

NOTARY ACKNOWLEDGMENT

STATE OF New Jersey  
COUNTY OF Hudson

The above named Affiant personally appeared this day before the undersigned and upon duly being sworn, made oath that the facts stated herein are true and correct to the best of his or her knowledge, information and belief.

Acknowledged before me on this 21 day of December, 2023.

Notary Public

MARY B. LOGAN  
Notary Public, State of New Jersey  
My Commission Expires  
March 08, 2026

SEAL AFFIXED My commission expires 3 / 8 / 28.

Affidavit  
of  
JOHN CAPRIO

STATE OF NEW JERSEY  
COUNTY OF PASSAIC

The undersigned JOHN CAPRIO, declares under penalty of perjury under the laws of the State of New Jersey that the foregoing statement made are true and correct.

1. I, the Affiant, am over the age of 18 and am a resident of the State of New Jersey. I have personal knowledge of the facts herein, and, if called as a witness, could testify to the truth and accuracy thereto.
2. I am resident of New Jersey and participated as a voter in the 2020, 2021 and 2022 election process, having first-hand knowledge of said elections in my role with the Liberty Project, Inc.
3. I, the Affiant, suffer no legal disabilities and have personal knowledge of the facts set forth below.
4. I, the Affiant, affirms that:

My name is John Caprio and I have been a resident of the State of New Jersey my entire life. I grew up in Secaucus in Hudson County and later moved to Lavallette in Ocean County in 2001. From 2001 (when I turned 18) until 2020 I was a registered voter in Ocean County. Shortly after the 2020 election, I renewed my driver's license, and upon renewal, I changed my address and voter registration to Clifton in Passaic County, where I presently reside today. I graduated Magna Cum Laude with a 3.70GPA from Drexel University in 2005 with a Bachelor of Science in Business Administration and a concentration in Finance, later receiving my MBA with a dual concentration in Finance and Accounting from Montclair State University in 2014 graduating Summa Cum Laude with a 3.94 GPA. Additionally, I have successfully passed two actuarial exams (P/1 and FM/2) back in 2008, self-guided. I also possess a real estate broker salesperson license, received in 2021 and prior to that I have held a salesperson license since 2003.

In my professional career I have worked in various roles including titles such as: Financial Advisor, Retail Assistant Manager, Operations Manager, Graduate Research Assistant, Real Estate Analyst, Realtor, Financial Analyst and Senior Financial Analyst. My educational background and professional experience in analytical research and data analysis made me an asset to Liberty Project, Inc's research team, but before I get into what I have worked on with the Liberty Project, I think it is important to mention how and why I ended up joining this group in the first place.

In March of 2020, the world changed for all of us. At first, I was terrified of COVID-19 and admittedly found myself glued to the television as more and more information began to come out. Case counts and death counts were on every news channel. Press conferences and briefings were held and eventually we were all told "Two weeks to stop the spread." Shortly thereafter, my fiancée's father who suffered from a sequence of health complexities due to diabetes including kidney failure, dialysis, became a principal family focus; an incident with low blood sugar left him disoriented and extremely weak. He also lived in Clifton, but not in our home, so we called an ambulance for him and due to the strict restrictions in place we could not go to the hospital with him. Instead, we waited for hours until we got the news from the hospital, he was ok to be discharged and instructions on where he could be picked up.

Previously when he had an issue like this, he would bounce back almost right away. This time he did not. In fact, the next day he said he felt worse and had developed a cough. We again called the ambulance for him, and they took him back to the hospital. His doctor called us and told us what we were dreading, he had Covid-19. The doctor asked if we had been near him at all and for how long. We were all told to quarantine, and I was given a return-to-work date of April 8, 2020. I had developed a cough that lingered for a couple of weeks, but never a fever; my fiancée had a fever and weakness for at least a week; her mother had no symptoms at all. My fiancée's father who should have by the standards we were all told at the time, been at very high risk for death or becoming seriously ill. However, he spent less than 24 hours in the hospital, and was sent home with a supply of hydroxychloroquine and azithromycin, making a rapid recovery; thank God.

While I know this is mostly anecdotal, I began to think Covid-19 was not the extremely deadly virus that the media and government officials made it out to be. Furthermore, I began to suspect that liquor stores being deemed essential was not the blessing I first thought, but rather a means to keep people compliant, complacent, and potentially even make us less healthy physically and mentally. I know from my personal experience that eating healthy is extremely difficult after a few drinks and after even more drinks, binge eating becomes a norm, and other mental health issues emerge.

My suspicions began to be confirmed as the lockdowns continued and places like restaurants, retail stores, or health clubs were forced to remain closed or operate at extremely reduced capacities. As more and more information came out it seems this was ultimately a virus that impacted the most vulnerable and healthy people came through it almost always unscathed. It is my belief that our government knew this long before we were told a couple of years later and that is evident in some of the parties they were caught at, socializing closely with others, not wearing masks, while their servers/workers were forced to wear them. I think of Governor Newsom's birthday party at French Laundry and Former Prime Minister Boris Johnson's birthday when the science told us to remain socially distant and not congregate in closed spaces. I also think of former President Obama's birthday on Martha's Vineyard where the restrictions may have changed, but staff were forced to mask up while guests did not have to honor the same rules. I also did not understand how some countries that use the metric system required 1m, others 1.5m, some 2m, and America 6ft. How could the science be so exact with these measurements, yet so different?

I remember being back to work by April 2020, but my schedule was half days twice a week with only half the staff, at one point half days every day, and then full days, but still only half the staff allowed at a time. Others were not so lucky as restrictions and lockdowns persisted, many people lost their jobs, businesses failed, or were fined/shut down if they went against any new rules/laws.

I was never one to suspect the government or media for only allowing one side to tell a story, as I am a firm believer that there are many sides to a story and often the truth lies somewhere in the middle, but the other side seemed to be completely shut out. I saw more and more "fact checking" and censorship in the ensuing months, than I ever saw in my previous, then 37 years, of life. Doctors who said Hydroxychloroquine or ivermectin worked were censored. Studies showing anything as a conflict to what the mainstream media, the CDC, WHO, and our elected officials were telling us were blocked or removed from social media outlets. Some of these were later proven to be correct.

Things got even worse during the riots/protests in the summer of 2020. Our eyes and ears were made to deceive us as buildings and businesses burned, people were attacked, and people were told it was fine to protest and, while encouraged, I do remember hearing mask wearing would not be required. Anyone that spoke out against this behavior, including our own president, were labeled as bigots, domestic terrorists, and other hurtful titles. I also recall a reporter saying that things were "mostly peaceful" even though businesses burned and at least one person was murdered that night.

This persisted through the 2020 election. Despite a potential global recession and many other larger topics that I was hoping would be discussed, debates mainly focused on covid and race issues in America. I saw time and time again one side being fact checked for statements made while the other was allowed to repeat completely debunked quotes without any disclaimers being attached to his statements. I saw a laptop that tied Joe Biden's son to troublesome/questionable business dealings being labeled as Russian disinformation. We now know this was a laptop owned by Hunter Biden and Joe Biden may have directly benefited from these dealings while being the sitting Vice President. I saw a candidate with little energy who barely left his home and had what seemed to be no true base from what my eyes could see, and ears could hear against an incumbent, while polarizing, who had record turnouts and support as he campaigned everywhere.

I have never seen a media, social media, elected officials, and others try so hard to go against everything an elected president said or did and divide this country. I remember prior to the 2020 election, before the vaccines came out, that many in the Democratic party said they would not take it. That changed quickly after the election.

I remember on election night watching multiple news reports and how some states were able to report results almost instantly, while others claimed we would not know results for weeks. I remember a report about a pipe bursting in Georgia, that was later debunked, yet election workers were told to stop counting and go home. I remember volunteers being blocked or removed, barriers being placed in front of them, and windows being covered so these volunteers could not observe election counting being done. I remember a state like Arizona being called for Biden by Fox News, while others that were very much in favor of Trump were not called for weeks. I also recall House seats that were clearly flips taking weeks to be called. How could there be such a difference between how votes were being tabulated and races being called?

I later remember looking at some results after the election and thinking there seems to be too many discrepancies for any of this to make sense. Clearly a lot of people agreed, as this culminated into a protest on January 6<sup>th</sup> which became a highly politicized day as the events unfolded. A day that was not as violent as some protests from months earlier was made to seem as bad as "Pearl Harbor" and other incredibly tragic days in American history. This hyperbole did not get fact checked and people that spoke against the 2020 election became labeled conspiracy theorists and/or domestic terrorists, similar to what was happening with Covid-19. Why did the media and elected officials rush to label people, some who claimed to have firsthand knowledge of malfeasance, with such damaging titles I asked myself?

At this time, I followed accounts on social media, and it seemed any of them that began to speak out against election results were permanently banned. The sitting President's account was banned for incitement of violence, yet other elected officials who spoke of actual violence or leaders in other countries that spoke of death



to others remained active. Like with Covid-19, I thought we the people were not being told the full story. Why was another side again being banned from speaking?

Because of all of this I started digging into some election data on my own. I looked at some of the national races, but ultimately focused on my home state of NJ. I saw record turnout numbers in addition to record voter registrations, and some of these registration numbers seemed high based on NJ's population. I also looked at some of the traditional voting trends and overall votes cast in previous elections. Could vote by mail really impact turnout this much and if so, why did turnout increase massively in some states, but not others? This initial research and questions led me to telegram, as many other social media platforms were censoring anything critical of the election. This is where I eventually discovered a larger group that shared theories and data regarding election anomalies. I shared some of my findings in this group and was ultimately asked if I wanted to join the research team due to the analysis I had shared. I had a call/interview with ForPublius (Mary Logan) and was invited to join the research team.

I believe we initially met weekly, and my first team lead was John Paul Jones (JPJ), a pseudonym, his name withheld to protect him from reprisal. Our first assignment was to find specific information on every county in NJ. This involved population trends, voter registration numbers, number of voters registered per party, vote total and types in the Presidential and the NJ Senate races. To avoid any type of bias we were not assigned the county in which we lived in. I was assigned Morris County as a primary and then Mercer as a secondary. I was later assigned Hudson and Cumberland Counties as an additional backup. These secondary and tertiary assignments were to ensure correct data was being reported. Early on, I noticed the population numbers seemed low compared to my personal analysis and I voiced using the new 2020 census numbers when they became available, as opposed to the older estimates that seemed to undercount NJ's population. This led to my first smaller group project.

I noticed one thing missing from the election data project was an estimate of the Voting Eligible Population in each county and in NJ statewide. Voting Eligible Population defers from Voting Aged Population due to additional qualifications that need to be met above age requirements. While there is more to it, for simplicity, and to allow room for some margin of error, in my analysis, a voting eligible person is a US citizen that is at least 18 years old. I ignored things like incarcerated persons and did not account for things that are not as easily quantifiable like institutionalized people who would be deemed ineligible to register to vote. I also ignored things like the homeless population (eligible to register and cast a ballot, but I think anyone would agree not all would ever register to vote, let alone cast ballots.)

I downloaded census information and demographic study datasets from the American Community Survey off census.gov to have a consistent estimate of NJ's population. From that population and the demographic makeup of it, I calculated the number of voting aged citizens for the years 2000-2020. I later updated this to include 2021 and 2022, as population estimates and demographics became available.

I compared these voting aged citizen numbers to four different sets of voter registration data for every year from 2000 through 2022:

1. Statewide Voter Registration Statistics from Election Day (these are reports from the Secretary of State)
2. General Election Turnout Reports (these are cumulative reports from the counties stating number of registered voters, ballots cast, etc.)
3. Statewide Voter Registration Statistics from Primary Day
4. Primary Election Turnout Reports

Primary Turnout reports could not be found for the years 2001 and 2009. Those years only have three datasets.

The ACS and Census data is at a 90% confidence level, meaning that for any data set we can be certain that 90% of the time the true count would/should fall within the range given. Also, I would argue due to my less strict guidelines for a voter, that no county or the state of NJ should ever be above 100% registered. Being a little more lenient, we could expect two to three counties at most being near 100% without saying a potential problem exists; the resulting findings were presented to the broader Team. Simultaneously, another Research analyst, "TheSojourner" had presented his findings on registrant trends by party affiliation, also presented to the broader Team. These distinct and consistent outlier findings would later become the subject of informative podcasts as well informational handouts for presentations by members of the Executive/Legislative/FOIA Teams as they met with State and County officials. Not one of the officials could answer the registrant related questions, nor had they shown the least bit of concern for the anomalies. Instead, many inquired of our intent with some seeking for our help in their re-election efforts; it was truly shocking.

After exhausting efforts to engage the Legislative body and County officials, I turned my focus back to data analysis. During this transition, Mary Logan presented the Liberty Project with an extensive presentation on the Center for Tech and Civic Life (CTCL), preparing the Team for another special project. Citing my analysis on registrant voters, I was asked to serve as one of two focused analysts on the CTCL project. The "CTCL project" involved analysis of uniform FOIA/OPRA requests sent by the FOIA Team members to all 21 New Jersey Counties. Similarly, the Secretary of State was sent two requests for a total of 7-Counties. The uniform requests were sent through email, certified mail, and/or through a portal if one existed. We were seeking information on



government grant monies pertaining to the 2019, 2020, 2021 elections. To ensure bias elimination, our training included peer audit of findings with my workmate analyst, Susan, evaluating my findings and myself, hers.

While working on the CTCL project, I retained my responsibilities on the Research Team where we closely observed the 2022 election. Eerily similar to the previous election findings, our Team's findings found absolute consistency in a variety of outlier areas; statistical anomalies that would be like lightning striking three times in the same spot. While the Research Team set about analyzing the immediate election and registrant data, the FOIA Team sought mail-in-ballot drop box video recordation from all 21-New Jersey Counties. Retaining autonomy among Teams and ensuring Chain of Custody were principal hallmarks of the Liberty Project; cross pollination happened only after training had taken place and all members were confident of the assigned tasks. Never once were we permitted to enter the project with a preconceived opinion. In fact, Mary Logan removed several members from the overall group because of their evident biases, later launching extensive conversation with the remaining Team on the importance of evidentiary findings through SWOT analysis, departing all conjecture and personal bias; this conversation would recur as the Teams began honing member summaries of their inclusive findings.

Prior to Covid-19 and the 2020 election I would not have considered myself a political person. I still do not really consider myself one, but I do believe others would label me as such. Many of the beliefs I formulated regarding Covid were based on information that was at first censored by the media and has since ultimately been proven to be true over the last few years. Over the course of my life, as a now 40-year-old, I have voted for candidates from the two main parties, as well as independents/third party candidates. I am a highly analytical person who enjoys doing my own research before coming to any conclusions and hopefully based on my background, and the statements I shared, this has been made clear. I continue to pursue the truth and rely on this to formulate my opinions, beliefs, and ultimately the decisions I continue to make in my life. Censorship and being told what to think are not what this country was founded on, not what I was brought up learning in school, and not the job of the media or the government.

I joined the Liberty Project because I was looking for an outlet to share thoughts and findings with a group who also sought the truth. What I have learned over the last two years and continue to learn is that I am surrounded by a diverse and incredibly talented group full of love for their country. We have differences in opinion, various skillsets, but a shared purpose; this has led to remarkable projects being completed. Despite personal challenges and work commitments, I have pushed through, working with others who have faced many challenges of their own. In spite of our best efforts, we have not been told the full story and facts continue to be withheld. Citing the cumulative facts in evidence, facts which I have personally touched, the only measure to ensure fair, equitable and Constitutionally informed elections going forward, is through hand counted paper ballots, no machines whatsoever, and voter ID. Registrant records should be maintained consistently. The right to vote is a privilege bestowed on citizens of this country. Whether a person votes or decides not to vote, they are making their voice heard. We the people deserve to know if our voices are being heard.

5. I affirm that I am under no duress to sign this Affidavit, and I declare that, to the best of my knowledge and belief, the information herein is true and correct.

Executed this 14th day of July, 2023.

Affiant Signature: [Signature]

Address: 77 Livingston St Clifton, NJ 07013

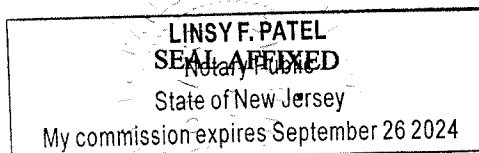
#### NOTARY ACKNOWLEDGEMENT

State of New Jersey  
County of Passaic

The above names Affiant personally appears this day before the undersigned and upon duly being sworn, made oath that the facts stated herein are true and correct to the best of the Affiant's knowledge, information and belief.

Acknowledge before me this 14th day of July, 2023.

[Signature]  
Notary Public Signature  
My Commission expires 9/26/24



Affidavit  
of  
(MARGRET CARTON)

STATE OF FLORIDA  
COUNTY OF Sarasota

The undersigned MARGRET CARTON declares under penalty of perjury under the laws of the State of Florida that the foregoing statement made are true and correct.

1. I, the Affiant, am over the age of 18 and am a resident of the State of Florida. I have personal knowledge of the facts herein, and, if called as a witness, could testify to the truth and accuracy thereto.
2. I am resident of New Jersey and participated as a voter in the 2020, 2021 and 2022 election process, having first-hand knowledge of said elections in my role with the Liberty Project, Inc.
3. I, the Affiant, suffer no legal disabilities and have personal knowledge of the facts set forth below.
4. I, the Affiant, affirms that:

At the time of the elections in 2020 and 2021, I was a New Jersey resident and participated in both elections. I received a BA degree from Kean University. I am a realtor and I interact with many, many people through my job in negotiating and assisting in the many facets of buying and selling a home as well as my involvement in my church. This prepared me for where I could use my skills for the Liberty Project. In 2020, everyone I spoke to thought there was something amiss in our election process, whether Democrat or Republican. On election night in 2020 in New Jersey, I went to bed with Donald Trump leading Joe Biden by a significant number of votes. When I got up in the morning Biden won after a PAUSE in the counting in the middle of the night and was declared President Elect, this despite hundreds and thousands of ballots to be counted and the election to be certified. As days went by, all kinds of voting issues became known, nationwide. This led me to believe that our country had an issue with election integrity and I was greatly concerned. I could not get my head around the fact that Joe Biden got more votes than Barack Obama, who was extremely popular among both parties. It was just not possible. During the summer of 2021, I finally found a group focused on sovereign elections as I wanted to do something about the voting process and find out if my misgivings were legitimate with regards to election integrity. From there I joined The Liberty Project which is comprised of Independents, Republicans and Democrats. I was trained and mentored by Mary Logan, President of the Liberty Project through meetings and dialogue. On the night of the 2021 New Jersey Governor's race... again, when I went to bed, Ciattarelli was ahead by a good number of votes. I was extremely disappointed that Ciattarelli conceded so quickly. The ballot counting went on for approximately 28 days. Murphy had won... Many friends told me about all kinds of voting issues when they went to vote. Yet, these concerns of WE THE PEOPLE were ignored or worse, with all firsthand observations including candidates, dismissed as conspiracy theory.

Within The Liberty Project exists 5 distinct teams. Among them Communications, Research, Media, FOIA/DOCs and Special Projects. I was asked to join the Communications Team and was trained by Mary Logan on engaging legislative staff and researching Bills and then meeting with New Jersey Legislators to see if they would be interested in joining our efforts to engage the public on voter integrity. We presented numerous Senators and Assembly Representatives with fact-based evidence, custodian originated. Our Research and Media Teams prepared multiple white sheets of fact-based evidence sourced from the New Jersey Secretary of State website and FOIA responses.

The team had meetings 4-6 times a week including training, legislative meetings and research dialogue. Mary Logan asked me to co-Lead the Communication Team in January. I went through extensive Lead training in February 2022. I continued to work with the Communications Team and provide help with contacting, dialoging and engaging legislators. The response was appalling. Many refused to meet with the Liberty Project and others would not even return our calls or respond to our emails. When we were able to schedule a meeting in person or in most cases Zoom, some of the legislators would not turn on their cameras for the Zoom meetings or they had their aides meet with us. If we did meet with a Legislator, we found that they had not reviewed the information sheets we sent to them prior to our meeting. We were trained to research Bills put forth by each legislator that we met with as well as finding out what committees they were on so that we would have a reference point of what each of them was involved in as a legislator. We were non-confrontational and very respectful of their time. When we asked about some of the Bills that they had put forth with regards to voter integrity, each advised that it was in Committee and they were not able to move it to the floor.

We met in person or on Zoom with over 30 Legislators, both Democrats and Republicans. We had comments directly from the legislators that said they "knew things were not right" for the 2021 election and "there was definitely some Hanky Panky with regards to the ballots" or "It's not my responsibility, talk to the election board." I found most of them dismissive and not willing to do anything to help with election integrity.

We had requests from them to help them in their campaigns which was a concern. These are the people that represent us at the state level and I truly felt they were only interested in their own re-election and did not represent the people's interests. We had no success in finding any Legislators who would work with us to work on Sovereign Elections, even though we had provided them with research that showed significant anomalies. I am deeply troubled by the lack of support for WE THE

PEOPLE and the voting process. Despite this, the Liberty Project kept going.

From March to July 2022, the Communications Team began to contact each New Jersey County and attempt to speak with and set up either in person or a Zoom meeting with all 21 County Clerks and/or Election Boards and/or County Commissioners, again meeting, training and being mentored by Mary Logan 4-5 times a week to prepare us for these meetings along with making numerous calls and emails to each county in order to set up a meeting. When we did have a meeting scheduled, members from the Communications and Research Team attended the meetings to go over the data gleaned from primary sources on the Secretary of State website and FOIAS. We were non-confrontational and worked at keeping to the time they allotted to us. When we presented our information, we compared and contrasted the Secretary of State information for each County and actually compared specific counties to another similar sized county. The Research team was able to formulate a document that gave visible proof for the county meetings which were distributed to whatever county official or officials we were meeting with and then explained by the Research Analyst that accompanied the Communications Team to the meeting.

We had many Counties refuse to meet with us. We had a total of 11 County meetings and had no success in finding any County representatives to work with us on Sovereign Elections, even though we had provided them with research that showed significant problems in the voter rolls. The response from most of the Election Boards or the County Commissioners was also heinous. Most were bored or were looking at other things while the Communications Team and Research Analyst made the presentations of their findings, specific to each county that agreed to meet with us. While they were gracious and listened to us, they too were not aware of any anomalies in their County even though our research indicated the opposite. It was disheartening to represent We the People and actually not have one person, whether in the Legislature or on the County level agree to look into what our data showed.

We decided not to continue to contact Legislators and Counties for meetings because they were not interested in working on Election Integrity. This is very concerning...the elected officials and those appointed or hired to represent WE THE PEOPLE and they had no interest in making sure our election process is secure. As the entire team continued to work on Communications, FOIA, Research, Special Projects and Media, Mary Logan asked me to co-lead the Research Team in the Fall of 2022 which I accepted. Again, I went through intensive Lead training with Mary Logan who simultaneously continued to train and work with all of the Research Team to keep us on point while assisting us in sifting through the data findings sourced from Secretary of State records, OPRA requests and FOIAs as well open source data which sought out voter registrations as well as election records dating back to 2012.

On August 25, 2022, I was with Mary Logan when the Liberty Project appeared at the Mercer County Courthouse to put forth our Plea for an injunction to stay the destruction of the 2020 and 2021 election records which were scheduled for destruction September 2, 2022. Staying the inclusive election records would ensure that outstanding FOIA's and other election related facts in evidence could be recalled for review, refuting or affirming the claims made in the election outcomes. After over a week, Mary Logan was told by the Ombudsmen that she could not locate the Pleading. Then she said the Pleading was incomplete despite having been reviewed by 2 staff members at the court in advance of its filing who had deemed it complete and stated so. At that point the Ombudsmen advised, because we were not represented by counsel, that we needed to file "*Pro Se*". Mary Logan and I appeared again at Mercer County Courthouse to re-submit our Pleading as "*Pro Se*" Plaintiffs. On September 2, 2022 we were told to wait while the Pleading was reviewed. After waiting an hour, Mary Logan contacted the Court and was advised by Judge Lougy's Chambers that the Pleading was viewed as non-emergent and would not be heard on that day. At which point Mary Logan attempted to serve the Defendant, Secretary of State Tahesha Way in her official capacity by UPS twice and FedEx once, all of which were refused delivery. On September 15<sup>th</sup>, service as provided to the defendant by a Summons Server. On August 30, 2022 the Pleading was sent to Sen. Orahio via his legislative email, having stated on our Legislative joint call, that he would support a forensic audit if the facts warranted. He further stated, "I would support a Pleading for injunctive relief to stay the records". Despite providing the Pleading to Senator Oroho, no acknowledgement, response or otherwise was received.

I continue to the present time to work with the Communications and Research Teams as lead to analyze primary sourced and originated material with regards to the 2020-2023 elections. The information derived from primary sourced facts is a component of the subject complaint. I am extremely concerned that it takes up to 28 days to count ballots in the State of New Jersey; this is a travesty. This can allow for ballot harvesting and manipulation of the peoples' voice and their intent, a fact which both parties (Republican and Democrat) now openly discuss as a standard in seeking elected office. The voters have been disenfranchised and there is no comprehensive Chain of Custody from one to thirty days of counting ballots to avoid this from happening. Ballots should be cast on the day of election and counted to declare a winner on that night. This is informed by the Constitution and should be retained. To ensure that a person is properly registered to vote as a citizen of New Jersey is also a must to have informed, sovereign elections. Each voter must present an ID at the time of voting. The Liberty Project will continue to seek Election Sovereignty for as long as it takes. We the People will stand firm with the Constitution of the United States and through the help of God.

5. I affirm that I am under no duress to sign this Affidavit, and I declare that, to the best of my knowledge and belief, the information herein is true and correct.

Executed this 13<sup>th</sup> day of June, 2023.

Affiant Signature:

Margit Carter

Address: 270 Santa Maria St, Venice, FL 334285

NOTARY ACKNOWLEDGEMENT

State of New Jersey  
County of Somerset

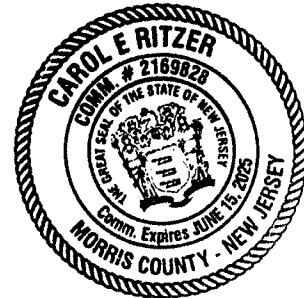
The above names Affiant personally appears this day before the undersigned and upon duly being sworn, made oath that the facts stated herein are true and correct to the best of the Affiant's knowledge, information and belief.

Acknowledge before me this 13 day of June, 2023.

[Signature]  
Notary Public Signature

My Commission expires 6/15/2025

SEAL AFFIXED





Affidavit of

Altaira D. Howanice

STATE OF NEW JERSEY

COUNTY OF MORRIS

The undersigned Altaira D. Howanice, declares under penalty of perjury under the laws of the State of New Jersey that the foregoing statement made are true and correct.

1. I, the Affiant, am over the age of 18 and am a resident of the State of New Jersey. I have personal knowledge of the facts herein, and, if called as a witness, could testify to the truth and accuracy thereto.
2. I am resident of New Jersey and participated as a voter in the 2020, 2021 and 2022 election process, having first-hand knowledge of said elections in my role with the Liberty Project, Inc.
3. I, the Affiant, suffer no legal disabilities and have personal knowledge of the facts set forth below.

4. I, the Affiant, affirm that:

I joined The Liberty Project in July of 2021. As the daughter of a naturalized US citizen from the Dominican Republic, I'd been taught it was both a responsibility and honor to vote in an election in this country for public office and choose the people who would ultimately represent you. I wasn't familiar with the minutia of elections and the voting process in New Jersey, but I had seen the outcome of the recently-held election, and I realized I had questions about the election results that weren't being addressed; I realized that members of the Liberty Project Inc. had many of the same questions I did, and I began researching the group.

I ultimately offered my assistance to the members of the Liberty Project Inc. because I believed we shared the same questions and desire for answers about elections and the voting process in New Jersey. I also believed that my ability to do legal research, legal writing, and my legal education and work experience might be helpful to the organization, so I was put in contact with Ms. Mary Logan. During my initial conversation with Ms. Logan about my education and background, I explained that I'd always had the ability to understand and explain complex legal issues, so when I decided to return college in 2006 to finish a BLA degree at UMASS Lowell online, I completed a double concentration in English and Legal Studies in December 2010 and a Paralegal Certificate in May 2011, graduating Summa Cum Laude that year. Prior to my graduation from UMASS Lowell in 2010, I worked briefly for a local attorney assisting with Loan Modifications, before eventually beginning my own Paralegal Services Company in September, 2012. Ms. Logan concluded the interview, having reviewed my education and background and connected me with the Directors of The Liberty Project and the legal team, when I was invited to join the organization to assist. I was pleased and honored to join the group—as a volunteer for the legal team, I truly believe I'm an asset to the organization.

The additional extensive training I underwent as a member of The Liberty Project Inc. has greatly augmented my existing legal education, especially in aspects of public policy and administration, improving upon legal skills and knowledge I'd obtained since 2006. I believe my continued involvement with the Liberty Project and additional training has ultimately made me even more well-suited to be a member of the legal team over the past few years. During the comprehensive and extensive training sessions there were many unique and complex legal concepts and procedures explained during extensive training sessions conducted by Ms. Logan and the Directors which I believe has better prepared me to assist the team for its work in several areas. I also found that the extensive training also improved my ability to adapt, as procedures sometimes needed to change quickly due to unforeseen circumstances. The detailed and extensive training regarding document and file origination, including documentation, handling and transferal of OPRA responses and files to preserve the chain of custody, closely mirrored many of those I had learned through my legal education and while working for the local attorney, years earlier, but were specifically tailored to meet the unique and demanding requirements of this work in particular... the depth of knowledge on the election and voting process in New Jersey that I've received as part of this process has become a genuine asset to me both professionally and on a personal level.

In my role as part of the legal team for The Liberty Project Inc. over the past few years, I have assisted the team by noting important details and documenting issues that exist in the information being returned or received by members from various local, county or state officials and departments. I have physically seen and handled the OPRA information received as requested by Liberty Project members in formal OPRA requests. I have also personally documented those official OPRA-requested items which were incomplete, omitted or that were not received by members of the Liberty Project Inc. in response to formal OPRA requests from officials throughout New Jersey at the community, municipality, county and state levels. As part of the legal review process established by the Liberty Project Inc. and the legal team, I routinely transferred the information I had documented during the legal review process to the legal team—notes on those issues I discovered which required follow-up or additional research were then forwarded to the Liberty Project team members for subsequent action as needed.

The task of performing legal review for The Liberty Project Inc. over the past few years has been challenging. I believe that concerns about reprisal at the professional level from the New Jersey state licensing board and others in the legal profession have made it more difficult to secure and retain the ongoing supervisory assistance of an attorney during the legal review process, which has made the process of conducting the legal review of documents more time-consuming and complex.

As part of my legal review work for the Liberty Project, I have seen many of the following issues in official documents returned or omitted in response to OPRA requests made by The Liberty Project Inc. members; several issues appeared to have resulted in—or constituted—breaks in chain of custody, which could affect the information's perceived validity. As noted below, OPRA requested information was not always received on a consistent basis—some counties/ officials would return the requested information as required under OPRA regulations, while others would refuse the official OPRA request for the same information. Some of the more common issues I noted during the legal review process included the following:

1. Incorrect responses by officials to OPRA requests from members of The Liberty Project Inc.; information and documents sent by the officials did not match information that had been requested in The Liberty Project member's original formal OPRA request. Ex: an OPRA request to the NJ Secretary of State was returned with different voter records than those which had been originally requested.

2. Partial responses by officials to OPRA requests from members of The Liberty Project; officials sent some— or partial— information in response to the formal OPRA request—but did not provide a complete response to the official OPRA request made, sometimes providing no explanation as to the reason for the incomplete information.

3. In numerous instances, a ‘No Responsive Records’ response—or no reply at all— was received in response to OPRA requests made by members of the Liberty Project Inc. from officials; officials in other communities, counties or areas provided the same kinds of information as requested in the official OPRA request. Ex: Bergen County sent voter rolls while other locations did not send any information in response to the official OPRA request.

4. Other issues documented for 2020, 2021 and 2022 official OPRA document requests included complete non-responses for Registration Correction Lists, Voter Rolls, Requests for Scanner-Tabulator records, Adjudication Records, requests for reports including Summary event Logs and bar code reports, Mail-in Ballot counting videos, ballot box videos, CTCL contract-related information, Election Day 2-hour reports, visitor logs, scans of ballots and ballot envelopes. Additional examples of non-responsive issues include: Interior ballot box log information was received for some locations in response to the official OPRA request, but other locations either did not respond or did not send the information; some communities provided 2-hour reports of election day vote totals but other locations did not provide the printed 2-hour report lists. In these cases, I referred the information with my notes, back to the legal team to return to the Liberty Project Inc. team for additional follow-up given the inconsistency in response by different communities, counties and officials.

5. In many cases, official documents received in response to the formal OPRA request by the members of the Liberty Project Inc. were missing relevant information, or had information redacted or otherwise revised. Issues documented included missing chain of custody signatures and/or time notations, missing Interior ballot box numbers, missing seal numbers, missing ballot count totals, redacted employee time card information, redacted seal numbers, redacted ballot totals and redacted comments; some interior ballot box logs ballot numbers were revised (strikethroughs) and /or had been changed. As with other examples noted above, I referred the issues together with notes taken during the legal review process, to the legal team to forward to the Liberty Project Inc. team for additional follow-up noting the inconsistency in response by different counties and officials.


As part of the legal review process, I also reviewed, documented and referred back to the Liberty Project Inc. Team for follow-up, Printing Contractor invoices that listed itemized printing costs for quantities of different sized ballots by Democrat (14" ballots) and Republican (17" ballots) political party affiliation; some invoices also listed itemized printing costs for 20" ballots. As documented in my legal notes to the Liberty Project Inc. Team during legal review, I noted that the separation of ballots by size and party affiliation could negatively impact ballot confidentiality, disenfranchisement of voters, ballot harvesting, as well as result in technical problems with input and tabulation via voting machine, requiring additional action or ballot adjudication later.

The above information reflects a brief summary of my background, training and work experience as a member of the Liberty Project Inc. to date, and is not intended to be an all-inclusive record; to retain

chain of custody for documentation, detailed notes made during the legal review process were transferred back to the legal team for subsequent follow up by the Liberty Project Inc. team. I am prepared to testify regarding the above information if necessary.

5. I affirm that I am under no duress to sign this Affidavit, and I declare that, to the best of my knowledge and belief, the information herein is true and correct.

Executed this 13<sup>th</sup> day of June, 2023.

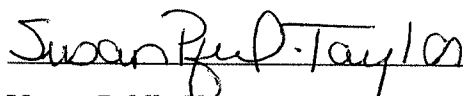
Affiant Signature:   
Address: 10 OVERLOOK DRIVE OAK RIDGE NJ 07438

NOTARY ACKNOWLEDGEMENT

State of New Jersey  
County of morris

The above names Affiant personally appears this day before the undersigned and upon duly being sworn, made oath that the facts stated herein are true and correct to the best of the Affiant's knowledge, information and belief.

Acknowledge before me this 13 day of June, 2023.



Notary Public Signature

SEAL AFFIXED

My Commission expires    /    /   

Susan Pfeil-Taylor  
Notary Public of New Jersey  
Commission ID# 2401926  
Commission Expires 11/3/2025



Affidavit  
of  
Susan T Stecewicz

STATE OF NEW JERSEY  
COUNTY OF MORRIS

The undersigned Susan T Stecewicz, declares under penalty of perjury under the laws of the State of New Jersey that the foregoing statements made are true and correct.

1. I, the Affiant, am over the age of 18 and am a resident of the State of New Jersey. I have personal knowledge of the facts herein, and, if called as a witness, could testify to the truth and accuracy thereto.
  2. I am a resident of New Jersey and participated as a voter in the 2020, 2021 and 2022 election process, having first-hand knowledge of said elections in my role with the Liberty Project, Inc.
  3. I, the Affiant, suffer no legal disabilities and have personal knowledge of the facts set forth below.
  4. I, the Affiant, affirms that
    - I have a Bachelor and a Master of Science degree. I started my career as a computer programmer and after a few years took on several analytical roles, then spent the last 20 years of my career as a project/program management professional, managing large system development and service delivery projects, such as, integrating data into reporting tools, enterprise software packages and web applications. As project management professional, I coordinated cross functional teams (e.g., business, software development, security, testing and infrastructure teams), and I leveraged my analytical and problem solving skills required to gather and document business requirements as well as manage multi-million dollar project budgets in order to deliver projects on schedule and within budget. I retired from my project management career in 2017 and continue to work smaller jobs that provide me with flexibility of hours until I reach my full retirement age.
    - In late 2021, I was terminated from my Pharmacy Technician job due to non-compliance with the company's COVID-19 vaccine mandate. In a letter I wrote and handed to my manager, I stated my desire to continue working for the company but could not take the COVID-19 vaccine due to my concern over its safety. In my letter, I provided statistics from the VAERS database (<https://vaers.hhs.gov/about.html>), a national early warning system to detect possible safety problems. I cited adverse reactions and even deaths related to the COVID-19 vaccines. I also pointed out that I worked in a back-office warehouse with less than 20 people in the warehouse at any one time, so the risk of receiving or "spreading" COVID-19 was low risk. I received no response to my request to remain employed and was terminated from my job.
- I believe every person has the unalienable right to refuse any and all medical treatment. I believe our bodies are sovereign and the sole responsibility for medical treatment rests with the individual (or legal guardians in cases of children).
- Over the past few years (2020 – 2022), I have observed the suppression of information (vaccine and election related) on social media platforms. For example, back in mid-2000's CNN reported on voting machine vulnerabilities but after the 2020 election, CNN and other mainstream outlets, as well as, big technology companies, such as Facebook and Twitter censored those speaking out against election irregularities, COVID-19 vaccine safety concerns and early treatments for COVID-19.
  - Also concerning, was Facebook's founder Mark Zuckerberg and his wife Pricilla Chan involvement in privatizing the US election process through the non-profit organization, CTCL, which I believe was intent on influencing the state, county and election officials by providing election funding to towns, cities and counties via contributions to general funds. These funds were categorized as funds to help jurisdictions hire more

staff, purchase mail in ballots processing machines, drop boxes, expansion to mail in voting, etc. For example, the Centers of Tech and Civil Life (CTCL), provided NJ counties approximately \$22,159,149.21 in private funding for the 2020 election. Although all 21 NJ counties received CTCL funds, the amounts varied.

- Around the August 2021 timeframe, I joined a group of volunteers (now known as New Jersey Liberty Project, Inc.). After participating on a couple of calls, I learned that several individuals had similar concerns regarding our elections as myself and we volunteered our services to better understand NJ's election processes. Different teams were formed, team leads were assigned and training was conducted depending on the assignment. I started out on the research team and helped collect 2020 election data from NJ.gov/state and NJ county websites for some of the NJ counties and I provided the information collected to the team lead. I was also a volunteer for the canvassing team and I received the required training with a strict script to follow. I canvassed one day per weekend (for approximately 4-5 weekends). I was also assigned to a special project called CTCL and was tasked with collecting 2019, 2020, 2021 and 2022 election revenue (revenue funding) for each of the 21 NJ counties and I entered the data into an EXCEL spreadsheet and documented a member summary with my findings/observations. As my work was winding down on the CTCL special project, I volunteered to help the FOIA team with OPRA requests. I was trained on how to document chain of custody (COC), such as documenting all correspondence and signing over COC, etc. To date, I have submitted approximately 49 OPRA requests. I am also currently reviewing video recordings of drop boxes from the 2022 election.
- In 2022, I participated in canvassing the 2020 presidential election. As a member of the canvassing team, I was paired up with a partner for the canvassing day and was provided with the names and address of persons to canvas. The canvassing team members were not involved in preparing the lists of persons to canvas and no information was shared as to how the canvassing list was compiled. Canvassers had a strict script to follow (e.g., verify name, address, did person vote? If yes, method -Drop Box, Mail, and obtain declarative statement from resident, if agreed to). I learned that individuals received more than one paper ballot and other individuals received mail in ballots for individuals not residing at their home address and I also recall not finding an address (no such address).
- In 2023, I submitted various election related OPRA requests to different NJ counties. Some OPRA responses stated that the vendor (e.g., dominion voting systems) was required to obtain information requested and therefore a vendor fee was being charged (e.g. \$517, etc.) to obtain the information requested. For several of the OPRA requests, it took weeks to hear back re: an initial request and/or a follow-up reply. There were also OPRA requests with no responsive records due retention expiration and when asked for receipt of destruction of records there was no responsive records.
- In 2023, I started the exercise of reviewing the 2022 general election video recording of drop boxes for the town of Readington in Hunterdon County, NJ. I observed the following:
  - There was 11 days of mail in voting (Oct 29-Nov 8; 10 days of early voting)
  - Several time gaps (a few to several mins) between start and stop times from one video to the next
  - For a couple of days (11/5 and 11/6), several hours' worth of video was missing.
  - A couple of videos had overlap in times
  - Police/sheriff experienced an issue in shutting/locking the drop box
  - I took note that on 11/3/22 around 5:21 am, two men had a stack of large sized envelopes and mailed them using the mail slot (not dropbox).
- My experience and/or observation with the vaccine mandate, censorship and listening to the testimony of people reporting election irregularities, raised a red flag for me and I began to see our sovereignty being eroded. And, after researching our elections using media sources, NJ county websites, through OPRA requests and canvassing it became apparent to me that there are many (too many) points of failure in our NJ elections, failures in chain of custody and lack of transparency leaving me with a loss of trust in our elections.

5. I affirm that I am under no duress to sign this Affidavit, and I declare that, to the best of my knowledge and belief, the information herein is true and correct.

Executed this 5<sup>th</sup> day of JUNE, 2023.

Affiant Signature: [Signature]

Address: 603 Brook Hollow DR, Whippany NJ 07981

NOTARY ACKNOWLEDGEMENT

State of NEW JERSEY  
County of Morris

The above names Affiant personally appears this day before the undersigned and upon duly being sworn, made oath that the facts stated herein are true and correct to the best of the Affiant's knowledge, information and belief.

Acknowledge before me this 5 day of June, 2023.

Gabriela Coello-Couto  
Notary Public Signature  
My Commission expires 08/13/2026

SEAL AFFIXED

**GABRIELA COELLO-COUTO**  
Notary Public, State of New Jersey  
My Commission Expires 8/13/2026

Affidavit  
of  
Donna Coons

STATE OF New Jersey \_\_\_\_\_  
COUNTY OF Somerset \_\_\_\_\_

The undersigned Donna Coons, declares under penalty of perjury under the laws of the State of New Jersey that the foregoing statement made are true and correct.

1. I, the Affiant, am over the age of 18 and am a resident of the State of New Jersey. I have personal knowledge of the facts herein, and, if called as a witness, could testify to the truth and accuracy thereto.
2. I am resident of New Jersey and participated as a voter in the 2020, 2021 and 2022 election process, having first-hand knowledge of said elections in my role with the Liberty Project, Inc.
3. I, the Affiant, suffer no legal disabilities and have personal knowledge of the facts set forth below.
4. I, the Affiant, affirms that:

After the 2020 election, in hopes of seeking answers to the many concerns I had about our elections no longer being sovereign I found the Liberty Project. In October 2021, several volunteers and I were provided several hours of training by Mary Logan on how to legally submit an OPRA request and retain the documents received in response. We were tasked with sending OPRA's pertaining to several New Jersey Counties regarding the 2020 election. The counties either did not respond, did not fulfill the request, or partially fulfilled the request.

The State of New Jersey spent \$77 million in 2020 to obtain new election machines. The counties continue to spend millions of dollars on these machines to update software, perform maintenance, security, and training for the use of these machines each year. My firsthand account regarding signature issues on the CERT tapes, ID numbers not matching the zero and CERT tapes, incorrect dates, no zero tapes, and the number of scanned ballots that did not equal the total number of ballots lead me to conclude that the Chain of Custody was broken. This did not solve the problem, in fact, it exacerbated the problem.

By Executive Order all New Jersey voters received a Mail-In Ballot for the 2020 Presidential Election. This multi-million-dollar taxpayer expense to print, mail, collect, sort, and count these Mail-In Ballots has burdened each county and municipality's taxpayer, without their consent, for every election since. The New Jersey State Mail-In Ballot Drop Box Guidelines issued by the Secretary of State were explicit instructions for the counties and municipalities on how to use the Mail-In Ballot Drop Boxes. Instructions and forms were provided for Planning, Purchasing, Securing, and Retrieving, Counting and Recording Mail-In Ballots.

As we approached the 2021 Gubernatorial election my role changed to lead the FOIA/DOCS team, after extensive training and mentoring by Mary Logan, President of the Liberty Project, Inc. As lead of an 11 member FOIA/DOCS team, in collaboration with Mary Logan, detailed and specific training was provided to the team on the FOIA/DOCS protocol to ensure proper origination and Chain of Custody was retained. Weekly team meetings were held to review any questions about the OPRA responses and the protocols for Chain of Custody, additionally, all members of the Liberty Project in our bi-weekly meetings, were taught to research primary sources and conduct analysis, omitting any conjecture.



On August 25, 2022, we appeared at the Mercer County Courthouse with a pleading for injunctive relief, for the 2020 and 2021 election records. Upon entering Mercer County Superior Court, I personally witnessed Mary Logan, serving as President of the Liberty Project, present the pleading to the Clerk of the Court for review who deemed it complete and directed us to the finance office to enter the pleading.

At the cashier's window the Clerk called over several other staff to consult. They determined that the pleading had to be taken for review to determine how it should be filed. Upon return she confirmed that the pleading was reviewed, and the fee was \$250.00, which was promptly paid. We, thereafter, proceeded to the Secretary of State, Ms. Way's, office. Upon our arrival at Ms. Way's office, the building was under construction, we made an inquiry with the State Police on duty, and they directed us to the temporary address. The security officer met us taking our licenses and attempted to reach Ms. Way's office by phone. Despite contacting multiple staff members, the calls went unanswered, which the security officer found peculiar.

Mary Logan, thereafter, made three attempts to have the pleading served to the Secretary of State. The first UPS which was refused twice and the third by FedEx was refused. Mary Logan called and emailed the court, Ms. Way's office, and staff several times over the course of the next week, finally reaching the Ombudsman, who upon speaking could not locate the filing. After some searching, she informed Mary Logan that the court tried to reach her finding it incomplete. Mary Logan had no record of any such communication, or attempt. The Ombudsman advised that the pleading had to be refiled as *pro se* citing the corporation had no council of record.

On September 2, 2022, Mary Logan and Peg Carton filed the *pro se* pleading in person. It was discovered during this communication that the case had been assigned to a judge that no longer worked at the Superior Court for several months. The peculiarity of these incidences seems to make it appear that the judicial branch of government is not proficiently trying to maintain the people's trust, but rather circumventing it.

As the FOIA/DOCS Lead for The Liberty Project, working with a highly trained team to secure fulfillment of the FOIA requests as outlined in the Complaint for injunction relief from the inclusive 21-Counties, the 11-member team submitted FOIA requests regarding election records extending from 2016 through present. Upon receipt of the records responding to our FOIA requesting the Registration Correction Lists we had our research team review these for completeness.

The research team discovered that this FOIA was not complete as the records received were the Mail-In Ballot registration names for 2021 and not the Registration Correction list for 2021 as requested. The result of the adjudication was cause for great concern since the court ordered dismissal of our request to retain the 2021 records and only focused on 2020, eliminating our ability to analyze the data to support or refute the facts. The Liberty Project teams were not discouraged, defeated, or deflated by the outcome of the court order dismissal. In fact, the members were never more motivated to seek the truth. Serving as the FOIA lead, I consulted the Secretary of State issued guidelines as well, DORES and all other election retention directives at which point the entire FOIA team was trained regarding these documents. We proceeded to amass in excess of 700 FOIAS, with remainder of this affiant statement regarding firsthand observations of same.

With the research team monitoring the 2021 election the FOIA team immediately began requesting election records. The parallels between the Presidential election and the Gubernatorial Election in New Jersey were uncanny. Between the period of June 2021 to the date of this affidavit the Liberty Project, Inc. submitted more than 700 FOIA/OPRAs with approximately one-third being fulfilled. The FOIA team used the OPRA machine, county OPRA portals or business emails. All requests were submitted using the exact language consistently to all 21 counties drawn from the state guidelines. In many cases, the requested records were denied for Non-Response Record although the retention period had not expired, or requested additional information for clarification or simply ignored.

In addition to the FOIA requests originated by the custodian of record and sent to our research team for analysis, in the Fall of 2022, we began on site visits which included county Clerk's, Boards of Elections, and legal departments where the following were personally witnessed by me:

**Certified Election Tapes: (CERT)**

- Certified Election Tapes and Zero Tapes having no signatures, one signature, some poll workers and every poll worker's signature.
- Dates did not correspond.
- Machine ID numbers did not correspond.
- Zero tapes were missing completely.
- The records reflected the total number of ballots scanned which did not mirror the total number of ballots recorded.

**Mail-In Ballot Drop Box Video Recordation:**

- Drop Box placement (voter patrons could not be viewed)
- Daily Pick up was not conducted (this was affirmed with postal boxes adjacent being picked up)
- Records destruction within 30 days of election.
- If hosted by public safety, recordation could not be viewed.
- Chain of Custody Forms incomplete or haphazard.
- Extensive lapses of time and voter patrons witnessed.

**Interior Ballot Storage Container Chain of Custody Logs: (The following items were omitted or missing)**

- Storage Container ID# and/ or Location and Date Team Members Names.
- Seal Numbers.
- Arrival Time not recorded.
- Checklist Not completed.
- No Ballot Counts.
- Departure Times not recorded.
- Certifying Signatures.
- Notes stating broken parts or replaced parts on the MIB Drop Box.

In my analysis of the Interior Ballot Storage Container Chain of Custody Logs it was apparent that the Chain of Custody was broken. Additionally, after viewing hundreds of hours of recorded video of the Mail-In Ballot Drop Box recordation (2022 election), I witnessed very few voters casting their votes using these MIB Drop Boxes. The fact that USPS mailboxes or tax collections boxes were in proximity to the MIB Drop Box caused some confusion to the voter patrons. Additionally, MIB Drop Boxes were not in full view of the security camera. Many counties destroyed their video recordation within 30 days.

Based on my firsthand account and witness to the foregoing in the case of 2020, 2021 and 2022 election records, the elections had no Chain of Custody extending to include the recordation which gives no reassurance in total number of ballots cast, thereby inviting disenfranchisement of sovereign voter citizens. We the People's Rights to sovereign elections have been usurped, manipulated, or not cast at all. I pray that we restore the People's Constitutional Right to sovereign elections secured and informed by the people. My trust in the three branches of government having been severed, I retain my trust in GOD.

5. I affirm that I am under no duress to sign this Affidavit, and I declare that, to the best of my knowledge and belief, the information herein is true and correct.

Executed this 22nd day of June, 2023.

Affiant Signature:

Lorria Coors  
Address: 10 Stirling Rd Berksdsvell, NJ 07924

NOTARY ACKNOWLEDGEMENT

State of NEW JERSEY  
County of Union

The above names Affiant personally appears this day before the undersigned and upon duly being sworn, made oath that the facts stated herein are true and correct to the best of the Affiant's knowledge, information and belief.

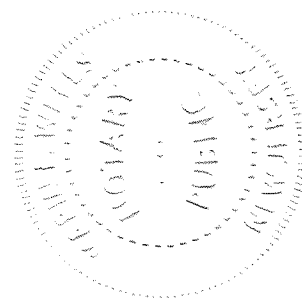
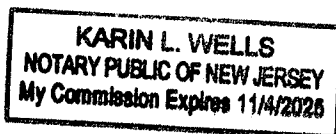
Acknowledge before me this 22nd day of June, 2023.

Karin Wells

Notary Public Signature

My Commission expires 1/1

SEAL AFFIXED



Affidavit  
of  
Michael J. Stumpf

STATE OF NEW JERSEY  
COUNTY OF MORRIS

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The undersigned Michael J. Stumpf, declares under penalty of perjury under the laws of the State of New Jersey that the foregoing statement made are true and correct.

1. I, the Affiant, am over the age of 18 and am a resident of the State of New Jersey. I have personal knowledge of the facts herein, and, if called as a witness, could testify to the truth and accuracy thereto.
2. I participated as a voter in the 2020, 2021 and 2022 election process, having first-hand knowledge of said elections in my role with the Liberty Project, Inc.
3. I, the Affiant, suffer no legal disabilities and have personal knowledge of the facts set forth below.
4. I, the Affiant, affirms that:

Having voted in New Jersey for more than 40 years prior to the 2020 presidential election, I had always considered myself a responsible citizen who voted regularly and with confidence in our election process. After the 2020 general election, I came to understand that my confidence had been misplaced. I observed disturbing developments like forced voting by mail, Covid restrictions on observation of ballot processing, and the funding and placement of drop boxes by undisclosed nonprofits. Not knowing if I and my fellow New Jersey voters were being victimized by 14<sup>th</sup> amendment violations, I became determined to get involved and find out if our elections had been honest and equitable.

In July 2021, I found my way to an online chat group of concerned citizens discussing how the New Jersey voting systems could be audited. I volunteered to help with communications and wrote a few introductory statements to help orient other interested parties. I would go on to assist many areas of activity as the group eventually became The Liberty Project.

I was soon asked to join the legislative team, and was given several hours of training on how to approach and set up meetings with State Legislators. I arranged and attended several in person and online meetings with Legislators and other Liberty Project members. While they were polite, no Legislator was interested in leading an effort to have an audit of the 2020 election, or for that matter do anything that would bring greater transparency to our election procedures. Disturbingly, a long serving legislator brushed off my questions about ballot adjudication with the statement, "It's voting in New Jersey, there's always going to be some shenanigans."

During the first half of 2022, I served as our groups canvass team leader. Before we began, the team and I spent two weekends training on how to approach voters, deal with questions, and assure strict confidentiality. The training was also focused on properly taking statements and producing chain of custody documents to verify the information we were entrusted with. In order to maintain a neutral stance, canvassers were not made aware of any voters political affiliation or personal identifiers. Additionally, canvass team members were not allowed to serve as analysts on the data the team collected, further assuring that all data would only come directly from the statements originated by the canvass team. The team canvassed for about 5 months, visiting some 2,000 voters in 8 different counties. We simply asked if they would share the method by which they had voted in the 2020 presidential election, either by mail, use of a drop box, or by an in-person provisional ballot. While we were trained to avoiding small talk, it was clear from our limited interactions and collected respondent statements that the public was unhappy. Approximately one third of respondents would volunteer that they simply did not like, or trust the 2020 election's ballot distribution and collection process. Through the canvass effort, it became clear that forced mail in voting and use of drop boxes had severely eroded voters confidence in the system.

Concurrently in early 2022, I assisted with recording and editing a video titled "New Jersey Liberty Project analysis of the November, 2021 Election". The 51 minute production presented data gathered by our research analysts from both published and FOIA originated sources. Their findings showed significant evidence of statistical and trend anomalies, many of which were consistent with what we had observed during the 2020 election. Such anomalies only serve to raise questions about the potential of electoral manipulation. In



particular, I found it unacceptable that the statistical discrepancy between results of mail in votes versus early in person and day of voting was never addressed by the Secretary of State and other officials who's constitutional duty it is to do so. The analyses further reported there was an absence of chain of custody records for many mail in ballots, making it difficult at best to prove the validity of the election. Without proper chain of custody records with mail in ballots, how can the augmented election process started in 2020 be trusted?

The media team also produced 9 videos that evaluated county registration data originated from FOIA records. Most of the counties showed similar trends, however there were notable anomalies. The important question raised is how several counties, in only a few years, could go from historic norms to having more registered voters than they have eligible citizens. These revelations were among many disheartening examples of how our state and local government are failing to properly administer the basic function of voter roll maintenance.

Upon completing my canvass duties, I joined the FOIA team and successfully completed more than 20 FOIA assignments. In most cases, county election officials and administrators were pleasant to deal with. However, they rarely displayed a sense of urgency in fulfilling the requests. While some requests were fulfilled with responsive data, many were not. In these cases, I would eventually receive a response that they had no responsive data, or that the wording used in the request did not directly match the wording and descriptive terms which were used in that particular county. I found this concerning when one considers that the requests were made using wording that is clearly stated and were for data and records which are required by election statutes. I also assisted with reviewing Drop Box security video footage, and while my understanding was that state law required 24/7 recorded video surveillance of Ballot Drop Boxes, we were surprised to find that much of the footage we reviewed was from cameras that only recorded in response to motion sensors. This led to footage that started and stopped at inopportune moments, especially when cutting out early when voters were still standing at and using the drop boxes.

For these and other reasons, I have come to understand that elections here in New Jersey are being conducted in a manner that is inconsistent with the laws set down by the state legislature, and in some cases demonstrating intentional disregard for the exacting chain of custody best practices that our rights of equal protection demand. Through this affiant statement, as a component of the legal action being taken by The Liberty Project, it is my hope that appropriate judicial intervention will lead to transparent and thorough reforms which will return our election system to one which conforms with our federal and state legislative statutes, the New Jersey Constitution, and the Constitution of the United States of America.

5. I affirm that I am under no duress to sign this Affidavit, and I declare that, to the best of my knowledge and belief, the information herein is true and correct.

Executed this 20th day of June, 2023.

Affiant Signature:

Address: 88 Clover Hill Drive Flanders NJ 07836

#### NOTARY ACKNOWLEDGEMENT

State of New Jersey

County of Morris

The above named Affiant personally appears this day before the undersigned and upon duly being sworn, made oath that the facts stated herein are true and correct to the best of the Affiant's knowledge, information and belief.

Acknowledge before me this 20<sup>th</sup> day of June, 2023.

Christine Heilman  
Notary Public Signature  
My Commission expires 06/21/2026

SEAL AFFIXED

CHRISTINE HEILMAN  
Notary Public, State of New Jersey  
My Commission Expires Jun 21, 2026

**accenture**

The CISA Task Order on the Alliant 2 Governmentwide Acquisition Contract (GWAC) will run for a base period of one year with four one-year option periods.

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# # #

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